



*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 25, 2023

To: [Dept. of Land Conservation and Development](#)

Re: [Draft 2021-23 Updated Policy Agenda - Support with Comments](#)

The League of Women Voters of Oregon supports our statewide land use planning program with local implementation. Both components are necessary for the success of the program. The League first studied land use in 1959 and has been active since then, both at the state level and locally. We believe that Goal 1 requires open access to the land use process and that all citizens have a stake in the development of their communities. As you develop rules to implement legislation, we encourage a broad diverse group of participants with representation among many interests and geographies.

**The League supports the Oregon Housing Needs Analysis (OHNA)** and looks forward to seeing implementation over the next two years with the eventual setting of targets for Housing for All so that cities can go forward to provide Comprehensive Plans, Development Codes and Housing Production Strategies that will locally meet those targets. This will take both state and local investment. It will take the willingness of local residents and the development community all working together.

**We note the need for considerable data in order to implement the OHNA and suggest you specifically list and provide a plan for aggregating the data needed:** Urban Growth Boundaries (UGBs) of each city with location (mapping) and acreage; Natural Hazards or Natural Features in these UGBs or nearby that would impede development (will need data from other agencies such as the Wildfire Risk Map, Wetlands Inventories and Wildlife Habitat Corridors); Public Facilities Plans, including their last update, for both current city boundaries and UGBs and data on need for updated infrastructure inside cities that limit development; data on industrial and/or employment lands so that a jobs/housing balance is achieved.

**The League supports our Farm and Forest industries and looks forward to the Scoping Report: Focusing on an evaluation and improvement of the state's zoning-based farm and forest land conservation program.** Protection of these industrial lands was a core reason for 1973's Senate Bill 100. Although other industries are important to Oregon's economy, these natural resource lands continue to provide good jobs for Oregonians. **Our agricultural industry, with its multiple crops, is one of the most stable of Oregon's industries.**

The League appreciates that the Coastal Division has items in the work plan. **We hope that addressing the importance of our coastal estuaries will be a part of the work. Not only are they home to such creatures as our iconic salmon, but are a vital part of meeting our climate goals.**

We note that last on the list is addressing State Agency Coordination Plans. However, **we cannot meet the goals in the OHNA without better agency coordination:** On water availability, where wetlands exist, where natural hazards such as wildfire risk or landslides are identified, and what water quality issues need to be addressed. **We suggest this item be elevated so that the data from other agencies can be incorporated into any OHNA work.**

The League appreciates the opportunity to provide input to the agency and the Commission as you consider your 2023-25 Policy Agenda. This agency has an important role to play in Oregonians' livability—in addressing climate change, housing, jobs, coastal issues and in the day-to-day responsibilities of the agency. We ask that you consider our comments as you adopt this 2023-25 work plan. We stand ready to help.



Rebecca Gladstone  
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Peggy Lynch  
Natural Resources Coordinator

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