



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.

August 25, 2023

To: Co-Chairs Damien Hall and J.D. Tovey and members of the Housing Production Advisory Council

Email: HPAC.Gov@oregon.gov

Re: Council Recommendations—**Comments**

The League of Women Voters of Oregon has engaged in both housing and land use policies for many years. Recently we have provided testimony to the Land Conservation and Development Commission and to the State Legislature, working alongside others to assure Housing for All—with a special focus on those most in need. **As you consider recommendations from your Work Groups, the League asks that you consider these values from a few of those testimonies:**

*The League of Women Voters of Oregon believes that persons who are unable to work or whose earnings are inadequate or for whom jobs are not available have the right to an income and/or services to **meet their basic needs for food, shelter, and access to health care.** The League has been working on this serious issue for decades.*

*The League of Women Voters of the United States believes that **the federal government shares with other levels of government the responsibility to provide equality of opportunity for education, employment, and housing for all persons regardless of their race, color, gender, religion, national origin, age, sexual orientation, or disability.***

*The League of Women Voters of Oregon believes the state's **tax system should be equitable and flexible enough to adjust to social and economic changes.** Furthermore, state and local tax structures should be examined and revised to benefit communities that provide housing for lower-income families.*

*The League of Women Voters of Oregon has long been a supporter of **our statewide land use planning program with local implementation,** engaging our members as far back as 1959, while continuing to update our positions, engaging in legislation and rulemaking to reflect those positions, and continuing to focus on **where we ALL live, work, shop, and play and how we get there.***

*The League of Women Voters of Oregon supports our statewide land use planning program with its 19 Goals. **We also have strong positions around water quality and quantity, coastal management, hazards and seismic risks.***

The League is proud to have advocated for a number of years on the need for affordable housing. We have participated in rulemaking and supported legislation to help Oregonians have safe homes. We support a local government's adoption of a Comprehensive Plan and Development Code to designate developable lands within their jurisdiction so long as they meet statewide Goals and rules around Hazard areas and Federal Emergency Management Act (FEMA) regulations around floodplains.

Using these values as a guide, **we support your focus on infrastructure funding**. It's buildable lots that developers need and those who build housing for those 60% and below AMI are most in need of financial assistance for infrastructure. An **on-going revolving fund** could provide help for individual lots in cities to pay for sidewalks, stormwater requirements, connection to sewer and/or water or road improvements. A fund could also help with the provision of infrastructure for raw land currently in Urban Growth Boundaries so those lands can be annexed into a city and the cost of multiple infrastructure needs reduced. **With the current federal government funding sources, Oregon should take advantage of access to those monies to supplement any state monies for such a fund.**

We have seen a draft proposal related to wetlands and you should be aware of the League's work to address this important issue. In 2019 we supported [HB 2438 A](#), which would have provided monies for Cascades West Council of Governments to work on a mitigation bank—in that case related to industrial lands, but could have been for housing as well. The bill was not funded and did not pass.

In 2023, the League supported the Dept. of State Lands budget requests, including **POP 104 to increase staffing in the removal/fill program**. *With the increased focus on housing and on new industrial lands, it will be important for the agency to help determine which wetlands need to be set aside and not counted as "developable" lands. We support POP 109 to carry forward EPA grant funding for the removal/fill program.* Their budget as passed included these Policy Option Packages.

However, **we do NOT support any recommendation that would change the definition of Oregon's wetlands**. *Oregon recognizes the role of wetlands in water quality and in flood management among other values. The waters of the state are an important public asset. Management of activities in these waters must be done carefully and with full application of state and federal regulations.* Remember the [Flooding of Vanport](#)? Or the perennial flooding of Johnson Creek in the Portland area? Or flooding in Pendleton or Tillamook? **No one, and certainly not our most vulnerable Oregonians, should have homes placed in areas that may flood.**


We are equally concerned by the potential recommendation related to tree removal. Many Portland neighborhoods with the least tree canopy cover and fewest parks also have the most impermeable surfaces, compounding the heat island effect. See a [KPTV map](#) of the Portland Metro area from 2023. **Trees and other greenspaces are valuable assets to absorb carbon (think diesel fumes in urban areas) and to help with our increasingly hot summers.**

As you consider recommendations, please consider that each of our cities has its own development code so, while recommending state assistance, each jurisdiction will need to address any recommended code changes. Our cities are hamstrung by their limited funding capacity due to property tax limitations passed in the 1990s. **Unless we address the need for city revenue, they will not have the ability to hire staff for planning, permit processing or building inspections, nor to reduce System Development Charges nor pay for upgrading or adding new infrastructure.**

Lastly, **we support the establishment of a Housing Production and Accountability Office, but we did NOT support the provision in HB 3414 B related to expansion of Urban Growth Boundaries.** We have a significant amount of raw land and adding more will simply drain resources needed for servicing current lands.

It is difficult to provide comments when materials aren't available ahead of meetings. We apologize if some of these comments are not applicable to this meeting. But know that the League of Women Voters of Oregon, with local Leagues around the state, are actively engaged in assuring our most vulnerable are housed.

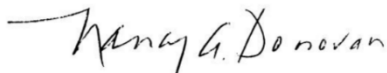
We ask that you consider our comments as you develop final recommendations to the Governor. Thank you for the opportunity to discuss your work.



Alice Bartelt
President LWVOR



Peggy Lynch
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Cc: [Geoff Huntington](#), Governor's Natural Resources Advisor
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