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March 24, 2015

Representative Brian Clem, Chair  
Committee Members  
House Committee on Rural Communities, Land Use and Water  
State Capitol  
900 Court St. NE  
Salem Oregon 97301

Re: HB 3282

Dear Chair Clem and Committee Members:

Thank you for the opportunity to testify on HB 3282. 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.

HB 3282 would provide for sequential review and approval or remand of individual work tasks associated with evaluation and possible expansion of an urban growth boundary (UGB). We appreciate the city of Bend discussing the bill with us in advance of this hearing. However, we conclude the bill is not necessary, and therefore oppose HB 3282.

The bill is not necessary for two reasons. First, there is already an ability for a city to conduct a sequential analysis in the current UGB evaluation system. A city can structure its UGB work tasks and review of those work tasks as part of its periodic review program with the Department of Land Conservation and Development (DLCD).

Second, and perhaps even more importantly, in the last full session, the Legislature passed an alternative, streamlined method for UGB evaluation, HB 2254, rendering this bill unnecessary. DLCD is now in a rulemaking process to implement HB 2544 – involving cities, counties, special districts, and others from around the state, assisted by technical work done by the University of Oregon – which will result in a more formulaic method to evaluate UGBs that is quicker and less expensive, and which cities can choose to use. As already mentioned, if a city decides to use the existing UGB evaluation method, it can already structure that in discrete tasks.

Because this bill is unnecessary, we ask that you not pass it.

Sincerely,

A handwritten signature in cursive script that reads "Mary Kyle McCurdy".

Mary Kyle McCurdy

Policy Director and Staff Attorney