

133 SW 2<sup>rd</sup> Avenue, Suite 201 • Portland, OR 97204 • (503) 497-1000 • fax (503) 223-0073 • www.friends.org Southern Oregon Office • PO Box 2442 • Grants Pass, OR 97528 • (541) 474-1155 • fax (541) 474-9389 Willamette Valley Office • PO Box 51252 • Eugene OR 97405 • (541) 520-3763 Central Oregon Office • 155 NW Irving Ave • Bend OR 97703 • (541) 797-6761

April 3, 2017

Chair Dembrow, Chair Senate Committee on Environment & Natural Resources State Capitol 900 Court Street NE Salem, OR 97301

Re: SB 418

Dear Chair Dembrow and Committee Members:

Thank you for the opportunity to testify on SB 418. 1000 Friends of Oregon is a 40-year old, nonprofit, 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.

SB 418 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).

The bill is not necessary for at least two reasons, and therefore we oppose SB 418. 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 the review of those work tasks as part of its periodic review program with the Department of Land Conservation and Development (DLCD).

Second, the Land Conservation and Development Commission (LCDC) recently adopted – at the Legislature's direction – a streamlined process that cities can choose to use when evaluating and expanding their UGBs. Cities and counties were very involved in crafting these new rules, and we expect them to be used in UGB expansions in the next few years.

Therefore, by creating a third process that is somewhat but not entirely redundant with existing UGB evaluation methods, this bill potentially adds unnecessary confusion and complexity.

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

Sincerely,

Mary Kyle McCurdy

Mary Kyle McCurdy Deputy Director