



March 18, 2019

House Committee on Human Services and Housing
900 Court Street NE
Salem, OR 97301

RE: House Bill 2306: Requires city or county to issue residential building permits upon substantial completion of construction of public improvements in residential subdivisions.

Dear Chair Keny-Guyer, Vice-Chair Noble, Vice-Chair Sanchez, and members of the House Committee on Human Services and Housing,

On behalf of the City of Beaverton, I am writing to express our concerns with House Bill 2306, as introduced. Beaverton recently was approved for a UGB expansion that will bring more than 3,700 housing units to the City through new residential subdivisions. We are excited about the new housing supply and homeownership and rental opportunities. At the same time, it is critical that essential infrastructure be in place to serve those new residents. HB 2306 would require building permits be issued when 80% of the costs of public infrastructure is complete and foresee several significant problems with this approach.

This cost-triggered limitation puts cities in an unacceptable position for two main reasons. First, some infrastructure must be 100% complete to ensure the subdivision is habitable and certificates of occupancy can eventually be issued. This infrastructure includes water, sewer, emergency-accessible streets, and outfall systems for stormwater related to streets, and is most effectively built up front. Beaverton is committed to efficient permitting and approvals. At the same time, speeding up when permits can be issued on the front end may only end up with certificates of occupancy not issued at the end of the process due to incomplete infrastructure.

Second, having a bond to back completion of the infrastructure doesn't guarantee that the funding is sufficient nor that a city has the staff available to complete the work left undone by the developer, declarant or owner of the property. This could not only, again, delay the issuance of a certificate of occupancy, it could negatively impact other planned public works projects.

For these reasons, I ask that you not to move forward with House Bill 2306, as introduced, or until these critical issues are resolved to ensure safe and appropriate infrastructure in new residential subdivisions.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in blue ink that reads "Cheryl Twete". The signature is fluid and cursive.

Cheryl Twete
Community Development Director