



May 11, 2023

Chair Julie Fahey
House Committee on Rules
Oregon State Capitol
900 Court Street NE
Salem, Oregon 97301

Dear Chair Fahey, Vice-Chairs Breese-Iverson and Kropf, and Members of the Committee,

Earlier this week, the Springfield City Council took the first steps in conducting a study of the City's planning fees to ensure that the City is a competitive place to develop in. While it's been over a decade since the City has completed this type of analysis, we hope to start doing it every 3-5 years to ensure that the City of Springfield remains a community of opportunity.

The City of Springfield also went through a comprehensive Development Code update process that was adopted last year. This has resulted in some significant efficiencies to promote housing production. A recent example is a new 128-unit apartment complex that was just approved. Prior to the code update, this development would have paid \$14,000 in application fees and taken at least 45-60 days to process. With Springfield's new code and fee structure, it paid only \$1,700 in fees and was approved in just 35 days, without imposing any significant conditions of approval. This reflects a true clear and objective approval path for housing that is easily attainable.

These are just a couple of examples of the work already underway to simplify and expedite the development process to ensure more homes are available in our community.

While we fully appreciate the ongoing housing crisis and agree with the intent of HB 3414 to remove potential barriers to housing development, the City has significant concerns about the variance process described in the -4 and -6 amendments. The City is already having to devote significant time and resources to comply with existing policies passed by the Legislature, we are working diligently to implement the associated housing code and mandates. This includes an upcoming Housing Production Strategy that will examine any barriers to housing development in Springfield and identify the tools and solutions to address those barriers. There is no evidence in Springfield's experience that a mandatory variance process, like that proposed, would do anything to ensure increased housing production.

We are concerned that HB 3414 allows developers to bypass many state and local development priorities, and that it jumps ahead of the strategic work the city will do to develop its Housing Production Strategy. A mandated variance process will result in significant detriments to livability, health, environment, climate, and equity – not to mention that the demands of the variance process on Springfield will likely eat up whatever time and money is saved through our other efforts to bolster housing production, including right-sizing our planning fees.

We would also note that with the onslaught of policies and regulations related to housing affordability and availability, the Legislature is putting cities in an untenable position of trying to determine how to comply with these while also being held to the requirements in things like the Climate Friendly and Equitable Communities rules, historic preservation rules, natural resource protection requirements, etc. For example, the -6 amendment would require a city to allow a variance directly conflicts with mandatory requirements for Climate Friendly Areas in the CFEC rules, forcing cities to choose which laws to violate. Well-intentioned, conflicting policies are the result of the Legislature and state agencies delving into the realm of city code, rather than sticking to the goals and guidelines that underpin Oregon's land use system.

The City of Springfield urges you to consider removing the variance process altogether and limit HB 3414 to the creation of a state Housing Accountability and Production Office (HAPO), with the side boards proposed to prevent increased litigation and delay for development projects. We believe that done right, the HAPO could assist with tools and data that would support communities increase their housing production.

We appreciate your consideration of our concerns and would ask that give full weight to the testimony you are hearing from your local government partners. We want to meet our housing production goals. We want to ensure our community members are housed. We want thriving communities. We want to support policies that will help get us there.

Sincerely,

A handwritten signature in black ink, appearing to read "Sean VanGordon", with a stylized flourish at the end.

Sean VanGordon
Mayor, City of Springfield