



March 5, 2025

Chair Marsh
House Committee on Housing and Homelessness
900 Court Se. NE
Salem, OR 97301

RE: Neutral position on HB 2138 -1, seeking amendments for -2

The City of Eugene appreciates Governor Kotek's efforts to increase housing production in Oregon and is taking a neutral position on HB 2138 and the -1 amendment, with recognition that additional amendments are coming forward to address areas of concern. We are engaging with the Governor's Housing Initiative Director, along with LOC and other cities, to amend the bill and address our concerns so that it can be implemented at the local level. Below are key areas/concerns that we ask to be addressed.

- We share concerns with other cities and LOC regarding the lack of clarity around the language related to traffic impact analysis and exactions for middle housing. We seek clarity within the -2 amendment that will address the aggregate impact of multiple middle housing developments on the street system.
- We are concerned with the current language requiring clear and objective standards for urban services and tree standards. The use of the definition of "urban services" which includes a broad range of infrastructure and services poses challenges, and has the potential to reach beyond the City's land use regulations, which is problematic.
- Recognition of the impact on the city's planning staff who are general fund supported. Eugene and other Oregon cities have carried a very heavy workload implementing the land use and housing laws that the legislature has passed in the past 5 years. This comes with a significant cost, borne at the local level and requires local land use priorities to take a back seat to state mandates. HB 2138 carries a substantial amount of work for local planning teams without consideration of that fiscal impact during a budgetary challenging time for cities in Oregon. Eugene requests a prioritization of the elements within HB2138 to support the elements with the highest potential to result in housing units built.

Thank you for the opportunity to comment and we seek your support in addressing cities concern within the -2 amendment process.

Respectfully,

submitted electronically

Ethan Nelson, Intergovernmental Relations Manager