



March 31, 2025

Rep. Pam Marsh, Chair
Committee Members
House Committee on Housing & Homelessness
State Capitol
Salem, OR 97301

Re: HB 3921 - City of Roseburg urban growth boundary

Dear Chair Marsh, Vice-Chairs Breese-Iverson and Anderson, and Committee Members:

House Bill 3921 would direct the Department of Land Conservation and Development to approve an urban growth boundary land swap submitted to it by the city of Roseburg. This land exchange involves a total of 513.5 acres, consisting of removing 284.5 acres from the Roseburg UGB and adding 229 acres to the UGB.

1000 Friends of Oregon¹ expresses its appreciation to the city of Roseburg and its staff for asking to meet with us to present their legislative concept. Our staff followed and analyzed this proposal as it went through the local process. We concluded it generally complied with state law on UGB land exchanges, and we did not object.

However, we cannot support HB 3921. State law provides for UGB land swaps, which was recently made even easier by SB 1537 (2024).² The city has proceeded through most of that process, and we believe it should be concluded without the legislature stepping into a very local, fact-specific process. The fact that objections have been made to the UGB land swap by those impacted is not a basis to circumvent the public involvement process. A UGB land swap, especially one of this size, is a significant action for a city, and people are naturally going to care and perhaps even object. The public - no matter whether they support or object to a significant land use proposal - often have insights that can make a decision better.

We do not believe it is an appropriate role for the legislature to override a process that works, and to instead essentially act like a local government body by rezoning specific parcels of land. In addition, it will cause other local governments to seek one-off changes from the legislature. The legislature establishes the policy and process for land use, and for myriad other functions of

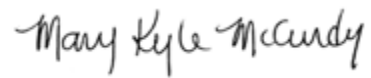
¹ 1000 Friends of Oregon is a nonprofit, membership organization that works with Oregonians to support livable urban and rural communities; protect family farms, forests and natural areas; and provide transportation and housing choice.

² The statutory authority for UGB adjustments is found in ORS 197.040, 197A.305, 197A.320 and 197.235, and in administrative rules at [660-024-0070](#)

local governments and state agencies who are the entities that apply those laws to individual situations. It would paralyze the legislature to be involved in the individual fact-finding and law-application necessary for these types of decisions. We urge you to not pass HB 3921.

Thank you for considering our comments.

Sincerely,

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

Associate Director