



People for an
AFFORDABLE
OREGON

Dear Chair McArthur and Members of the Land Conservation and Development Commission,

Thank you for the opportunity to provide comments today. People for an Affordable Oregon is made up of community members and organizations who believe that addressing climate change is valuable, but solutions must be reasonable and not set Oregon back on overcoming our housing crisis and achieving economic recovery post-pandemic.

Since 2020, each of you have been diligently involved in answering Governor Kate Brown's executive order 20-04 to create new housing and transportation planning rules to meet Governor Brown's GHG reduction goals. But now, we, the undersigned People for an Affordable Oregon, implore you to please slow down on the adoption of these new transportation and housing planning rules until additional studies can be conducted on their impacts, and more people can become aware of the rules and take part in the conversation.

We know that there are likely to be harmful and unintended consequences from these rules, including increases in housing costs, gentrification, loss of housing choices for consumers, impacts to traffic congestion, and costly outcomes for small businesses. Our local governments are unprepared for the magnitude of these changes, and will need substantial resources to be able to implement these rules. Otherwise, we may risk overloading an already stressed system.

We urge you – rather than adopting these rules on May 19, please instead:

- **Study the impacts.** Develop a plan to study the impacts of these rules on housing choice, gentrification, displacement of vulnerable community members, costs to small businesses, impacts to traffic congestion and local infrastructure, and whether the rules will allow us to answer the actual needs of communities.
- **Broaden the conversation.** Work to broaden the conversation to ensure that the affected community members, businesses, state and local elected leaders, housing advocates, and members of historically marginalized communities have a chance to catch up, understand these rules and weigh in. These rules impact many aspects of our communities, and important voices were not brought to the table.

These rules are exceptionally complicated. Housing and transportation experts, and community advocates are still raising good questions about whether portions of the rules are operable, or in-fact contradictory. We have no idea how we will pay for implementation of the rules, or whether cities will be responsible for funding those additional costs on their own.

In order to turn their attention to implementing 130 pages of new rules, city governments will be almost certainly forced to abandon or set aside existing and needed community-approved plans for transportation and housing advancements in their communities. This will slow down critically needed housing and infrastructure development—impacting people in our state to a very great degree.

We are also concerned about how these rules will impact the communities the rule-making process was designed to protect: Low-income families, communities of color, seniors, disabled community members and other vulnerable populations. Requiring local jurisdiction to utilize DLCDC's Anti-Displacement Toolkit and the Housing Production Strategies is a good starting point, but they don't give cities the tools they need to prevent housing costs from rising, to provide more affordable housing, to mitigate gentrification or address displacement of families caused by the rules themselves.

These rules are also likely to have significant impacts to businesses, traffic congestion, and freight travel. Local governments will be required to plan, design, and build streets and highways for the minimum size necessary for users. This means narrowing local street widths, reducing standard block lengths, and increasing pedestrian facilities and bike lanes on shared roads.

Transportation experts fear that these rules may cause more congestion and time spent in vehicles, which will have strong implications for our supply chain. Freight mobility has been under increasing stress due to a rise in just-in-time inventory management and online retail, and the importance of supply chains has been a significant business factor in the last year. Oregonians cannot afford greater disruptions to our supply chain as they try to recover as the pandemic.

In sum, the rules simply aren't baked yet. We don't understand the impacts. And we can't afford to get these rules wrong. Please pause on adoption, study the impacts, and broaden the conversation.

Signed,

The supporters of People for an Affordable Oregon