



August 29<sup>th</sup>, 2024

Chair Deborah Lockwood  
Washington County Planning Commission  
155 N First Avenue  
Hillsboro, OR 97124

**Re: Washington County SNR Update (Ordinances 901 and 902)**

Chair Lockwood,

The Home Building Association is dedicated to maximizing housing choice for all who reside in our region by shaping an environment in which industry professionals can effectively meet the diverse needs of all communities. For decades, the home building industry has delivered strong economic and community impact in Washington County—creating thousands of new homes and generating invaluable economic and community value for residents.

We are writing to provide our comments on the county's Significant Natural Resources Update and Inventory project, which seeks to refine regulations and develop clear and objective standards for rules concerning Riparian and Upland Wildlife habitats. **We believe that, though state-mandated, the county should view the project not only as a chance to protect sensitive natural resources, but also an opportunity to safeguard infill and middle housing development from over-regulation.**

We hope that the county staff and planning commission will consider the following adjustments to Ordinances 901 and 902, which we believe could help protect infill housing development from being adversely impacted by this SNR update:

- Reduce the impact that the SNR update will have on smaller lots by exempting infill lots of less than 3 acres in size;
- Reduce the preservation points required for smaller lots and/or establish reasonable ratio caps for onsite replanting obligations;
- Create a *modest* offsite mitigation tool or fee-in lieu of program in order to offer particularly small or challenging sites a pathway to develop while still growing the county's tree canopy in sensitive areas. Off-site planting sites could be particularly useful to local Street-Tree Planting Programs, Tualatin Hills Parks and Recreation Department's priority planting areas, and/or to Clean Water Services' Strategic Watershed Assessment & Planning areas;
- Compliment the GIS Mapping tools currently being used with a more deliberate field verification process. Especially given the severe impact that recent winter storms have had on the health of

the region's tree canopy, we believe that properties' tree coverages may be misrepresented in initial mapping;

- Ensure there is clarity and a certain level of vesting offered to the permits or projects that are active to ensure that ongoing developments are not adversely affected by this rule change.

We believe that these submissions should be reviewed by the county and planning commission in order to ensure that any changes to county development code does not have a negative impact on housing development, particularly for infill and middle housing projects. HBA hopes that county staff, planning commissioners, and ultimately county commissioners will assess the proposed changes found in Ordinances 901 and 902 in light of our increasingly constricted land supply inside the UGB for housing development. We must find balance between our obligation to protect precious natural resources and our region's critically important goals to create new housing opportunities near urban cores.

Thank you for your consideration,

A handwritten signature in black ink, appearing to read "Preston Korst". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

**Preston Korst**

Director of Public Policy and Government Affairs  
Home Building Association of Greater Portland