



## Deputy City Administrator

Jonas Biery, Budget & Finance

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February 10, 2025

Senate Committee on Judiciary  
900 Court Street NE  
Salem, OR 97301

Re: Support for SB 300 with requested amendment

Chair Prozanski, Vice Chair Thatcher, Members of the Senate Committee on Judiciary,

On behalf of the City of Portland, I am writing to request your support of the policy position represented in SB 300, which updates the definition of "Private Security Entity." Additionally, the City of Portland requests a small amendment to further clarify the definition and address a costly challenge we have encountered in Portland.

The City of Portland opted to require its City Park Rangers and Streetcar Fare Officers involved in municipal code enforcement to obtain an unarmed private security professional certification from the Oregon Department of Public Safety Standards & Training (DPSST). This policy choice allowed those staff to attend and receive training through DPSST even though they are not private security. While DPSST's training provided valuable information and perspective, it was voluntary and should not convert Park Rangers or Streetcar Fare Officers into private security professionals. Those staff already operate under local ordinances and rules for the enforcement of city codes that are not related to the work of private security professionals. Unfortunately, the City discovered after the fact that registering staff for DPSST's training resulted in them inadvertently falling under the "private security entity" umbrella even though they do not provide for-hire private security services. Worse, this has resulted in monthly fines of \$10,000 for one bureau and warnings that fines are coming, issued to other city bureaus.

We appreciate the bill's proponents making other technical changes to the bill at our request and would urge further clarity by making it explicit that political subdivisions are exempt from the private security entity program under ORS 181A.840(6)(b)/SB 300 section (6)(a) by making it clear that a private security entity does not include "a political subdivision."

Thank you for considering this request.

Sincerely,



Jonas Biery  
Deputy City Administrator, Budget & Finance, and Chief Financial Officer