



Representative Ken Helm, Co-Chair
Representative Mark Owens, Co-Chair,
Representative Sarah Finger McDonald, Vice Chair
Members of the House Agriculture, Natural Resources, Land Use and Water Committee

The Association of Oregon Counties offers this letter in **opposition to House Bill 2950 as drafted.**

House Bill 2950 calls for a Rules Advisory Committee to be formed at the Department of Land Conservation and Development to make changes to Goal 1 – “Citizen Engagement.”

The Association of Oregon Counties are supporters of having public engagement and public involvement in the land use planning process. However, the way this bill is drafted causes significant concerns for our Planning Departments.

Section 3 of the bill lays out a timeline that must be met by counties (based on population) for updating our comprehensive plans, land use regulations, zoning ordinances, rules, plans, and community involvement programs. The bill states for counties with a population over 250,000, they must update all of these documents within 180 days after LCDC approves the new Goal 1 rule. Counties with a population of more than 100,000 but less than 250,000 will have 270 days; and counties with less than 100,000 will have 540 days.

The legislative process, with constraints on noticing and hearings, takes time to complete. This includes the necessary Measure 56 notices, a first evidentiary, two subsequent hearings by the County governing body, related appeal periods, and DLCD appeal. If a county were to adopt changes as a text amendment, even as a straight adoption of state law which were uninteresting to the public, they typically take more than 90 days.

One of the requirements of Goal 1 (OAR 660-015-0000(1)) is that a local jurisdiction must have an adopted citizen involvement plan that outlines the procedures that will occur. Since this will be an artifact of the old Goal 1, these will need to be revised. This would most likely need to occur in advance of a text amendment process, so additional time is needed. If the new RAC makes any changes to the current requirements for citizen involvement committees, additional time is needed to recruit and fill those positions.

Development and Zoning Ordinances or Code procedures are all based on Goal 1. Updating these documents is rather labor-intensive work and resources will need to be allocated accordingly. As many counties allocate resources during the budgeting process, the expectation that county planning departments can make the necessary adjustments during a single calendar year is unrealistic.

Finally, Section 3 also asks counties to amend any additional rules, plans, and programs to be in compliance with the new Goal 1. This will also be a very resource heavy request on the Planning Departments. County Long Range Planners would typically need a calendar year to do the necessary

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research and drafting alone, if this was the only task they had. Most departments will have already allocated the long range resources to other necessary projects DLCD and the state have asked of County Planning Departments, including the most recent DLCD rule updates of Goal 3 (Farm), Goal 4 (Forrest), Goal 5 (Natural Resources and Wildlife), Housing updates, Clear and Objective Standards, to just name a few.

It also cannot be unmentioned that the significant amount of work being asked of the County Planning Departments through this bill does not include any financial resources to assist. **As drafted, HB 2950 will have a fiscal impact on counties.**

Goal 1 is a foundational element of Oregon's Land Use program and system; and because of this, any changes deserve careful consideration. There will be big questions that this RAC will be needing to address, and as these will take significant time, local jurisdictions that implement Goal 1 should be given the same time to consider any new rules and how to adopt a plan that works for their citizens.

AOC respectfully requests the committee reject House Bill 2950 as drafted.

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