



Senator Khanh Pham, Chair

Senator Dick Anderson, Vice Chair

Members of the Senate Housing and Development Committee

The Association of Oregon Counties would like to share concerns regarding **SB 462** as drafted. Although the Association does not currently have an official position, we felt it was important to get some of these issues on record. Furthermore, AOC is committed to working with the bill's proponents to address our concerns.

**Broadly Sweeping:**

The way this bill is currently written, any county employee other than an elected official is responsible for taking a mandatory class if they apply or interpret an "LCDC rule, state agency coordination program, statewide land use planning goal, comprehensive plans, Metro functional plans or a land use regulation (Section 2(3)(a))." Because of this language, it has the potential to impact planning staff as well as surveyors, assessment and taxation, clerks and recording, public works, law enforcement, as well as others. The statewide Land Use Planning program relies on interagency and department coordination to analyze and apply state and local regulations.

**DLCD is exempt from this course:**

The bill states in Section 2 (3), employees of the Land Conservation and Development Commission as well as LUBA are exempt from having to take this course. The Department of Land Conservation and Development are responsible for both reviewing and approving many land use decisions by a local government, some of which include comprehensive plan reviews and Urban Growth Boundary expansions. AOC believes it is very important if local government staff is required to take the course, DLCD staff should as well.

**Qualifications of those teaching and developing the course:**

The bill as drafted appears to only require the instructor to be "involved in or represent the development industry." It does not require any other basis of qualifications for those that will teach the course. AOC strongly encourages this to be further refined in the amendment process if the bill is to move forward.

Although this is just three concerns raised, AOC looks forward to working with the bills sponsor and proponents on amending this concept.

Thank you.