

AOC ASSOCIATION OF OREGON COUNTIES

Date:	March 17, 2025
To:	Senator Khanh Pham, Chair Senator Dick Anderson, Vice Chair Members of the Senate Housing and Development Committee
From:	Association of Oregon Counties Legislative Affairs Manager Branden Pursinger
Subject:	Senate Bill 974

The Association of Oregon Counties (AOC) is a non-partisan member organization that advocates on issues that unite all county governing bodies and have an impact on county functions, governance, budgets, and services.

AOC is in **opposition to Senate Bill 974 and the -1 amendment**. First it is our understanding a forthcoming -2 and possibly even a -3 is being worked on. AOC appreciates the opportunity to continue those conversations with the bill proponents.

The -1 amendment includes a requirement for Counties to process building permits in 45 days for the development of a single-family dwelling. 45 days is not a realistic timeframe for planners to process everything that is needed. For type II decisions, public notice, public comment and appeals take over 30 days as that does not include the actual review timeframe of the application. If the state is interested in land use decisions in 45 days, from our perspective the following would need to occur.

- Limit the decisions to only inside UGBs. This would remove any resource land concerns.
- Require these permits to be processed as Type 1, ministerial in nature. This would remove the public comment and appeals process for housing and give the planning departments the full 45 days for review.
- Additional time for environmental overlays or impacts. Any application that is in a floodplain, coastal dune, wetland, etc., needs additional scrutiny to ensure compliance with Oregon's Land Use Goals and Comprehensive Plans.

The -1 amendment creates the “urban housing application”. It is important for this committee to know that amending a comprehensive plan includes citizen involvement and takes a minimum of 90 days. If the desire is for the 120 day clock to pertain to everything found in the urban housing application, we believe some changes need to be addressed.

- Complete Applications. Local governments need to start their reviews of land use permits with a complete application. Counties currently have 150 days per statute to process a land use permit. If counties are going to have a reduction in the amount of time for review, the clock needs to begin once all materials are provided.

- Additional time for Land Use Goal considerations. If the urban services requirements found in Section 8 (21)(a)(D) fall under a 120 day review clock, there is concern DLCD goals could be triggered. For example, if the urban service work triggers a goal 5 review by the State Historic Preservation Office. This review will take longer than 120 days and thus additional time will be required.
- The engineering section covers what are typically referred to as “urban services” which can be found in ORS195.065. These services are provided by cities. Counties respectfully request Section 11 to say “city” instead of “local government”.

A forthcoming -2 and possibly even a -3 are being worked on. AOC, The Planning Directors, and Surveyors look forward to continuing the conversations with the bills proponents regarding the concerns raised above.