



American Planning Association
Oregon Chapter

Creating Great Communities for All

February 19, 2025

Senate Committee On Housing and Development

Re: SB 462

Position: Oppose

Dear Chair Pham, Vice-Chair Anderson, and members of the committee:

I am writing in opposition of SB 462 as introduced, on behalf of the Oregon Chapter of the American Planning Association.

The Oregon Chapter of the American Planning Association (OAPA) is a nonprofit professional membership organization of over 800 planners and those who work with planning in formulating and implementing development and conservation policies at the state and local level. OAPA works to create sustainable and vibrant Oregon communities through professional development, advocacy for sound planning, providing resources to meet the challenges of growth and change, and embracing and promoting diversity, inclusion and equity.

OAPA offers networking opportunities for planning professionals across Oregon, as well as ongoing, specialized continuing education courses. OAPA works to ensure that planning professionals are up-to-date on the latest planning news, trends, training opportunities and policy changes that impact not only our profession, but our state's planning program as a whole.

One key legislative priority for OAPA is to protect and support Oregon's planning program, which is fundamental to ensuring that cities and counties can comprehensively plan for both present needs and future generations. We believe that any proposal affecting this program must be carefully evaluated to avoid unintended consequences.

If passed, SB 462 would mandate that the Oregon Business Development Department establish an educational course — including both training and testing components — for land use planners employed by local governments, special districts and state agencies (with the exception of DLCD and LUBA). The requirement would apply to new employees within one year of hire and then every two years thereafter, with records of course completion to be maintained for six years. The bill further specifies that the course should cover basic economic principles related to land development, the societal benefits of property and home ownership, foundational aspects of Oregon land use law (including state housing requirements), and the economic impact of regulation. It also requires that those responsible for developing and delivering the course be directly involved in, or represented by, the development industry.

OAPA has several concerns about the structure and assumptions made in this policy proposal. In effect, SB 462 appears to be based on the premise that land use planners currently lack sufficient knowledge of the marketplace and land economics, and that such deficits adversely impact planning outcomes. Moreover, the bill assumes that the best instructors for these education courses are those with development industry backgrounds. We are concerned that these assumptions oversimplify very complex challenges, and may not adequately serve the planning community as intended.

While planning challenges are complex, planners do not come to the planning process or decision-making stages without training, experience and knowledge. Oregon's land use planners are highly qualified, often AICP-certified professionals. I myself have a masters degree in Regional and Urban Planning from a Planning Accredited Program (Portland State University) and am certified in the American Institute of Certified Planners (AICP). Qualifications to be an AICP are a minimum of years of experience tied to a level of education and passing an exam that tests planning knowledge and skills. Maintaining AICP status requires obtaining a minimum of 32 hours of continuing education in a 2-year period, including mandatory credits for ethics; legal issues; and sustainability and resilience.

While OAPA agrees with the premise that planning professionals should be continuously trained and knowledgeable of the issues most prominently impacting our state, we do not agree with the approach that SB 462 would take to accomplish this, or the underlying assumption that ongoing education is not an existing practice for planning professionals.

The American Planning Association for example, including our Oregon Chapter, offers continuing education opportunities for planners almost monthly — including events and courses focused on land use planning, land division, transit, housing and more. OAPA also provides legal issues workshops designed to help planning professionals with case law review, ethics training, and other important topics. Further, the American Planning Association requires planners with AICP credentials to obtain 32 credit hours of continuing education every two years.

In addition, OAPA is concerned about devoting the State's limited resources for what would be needed to implement HB 462. Furthermore, if land use planners are mandated to complete this course, it raises questions about whether other stakeholders — such as bankers, realtors and developers — might also benefit from a course in land use planning, ideally administered by DLCD.

In light of these concerns, we suggest that the Committee consider posing several questions to the proponents of SB 462, including:

- How are the qualifications of the proposed instructors vetted?
- Who determines which employees must take the course?
- What is the rationale for requiring course completion every two years?
- What are the anticipated time and resource obligations for both employers and employees?
- What testing protocols will be implemented, and what consequences are associated with them?
- Who will be responsible for the course fees?
- Why has the responsibility been assigned to BDD rather than DLCD?

OAPA firmly believes that the proposed measures in SB 462 could impose unnecessary burdens on land use planners, local jurisdictions, and the State Planning Program. We are concerned that these impacts may ultimately hinder effective planning and decision-making rather than enhance them. If the Committee is inclined to move forward this legislation for further consideration, we would ask that the training be coordinated with DLCD and OAPA to ensure that the training is objective.

We respectfully request that the Committee take these considerations into account as you evaluate SB 462. It is our hope that the concerns raised will prompt further discussion on how to best support the planning community without diverting critical resources or oversimplifying complex educational needs.

Thank you for considering OAPA's testimony and for your continued commitment to ensuring that Oregon's planning framework remains robust, comprehensive and responsive to the needs of all stakeholders.

Sincerely,

A handwritten signature in black ink that reads "Jonathan Harker".

Jonathan Harker

Chair, Legislative and Policy Affairs Committee
Oregon Chapter of the American Planning Association
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