



May 17, 2022

TO: Oregon Land Conservation and Development Commission

Submitted Electronically to esther.johnson@dlcd.oregon.gov

RE: May 19 & 20, 2022 Commission Meeting; Agenda Item 11; 2023-25 Draft Policy Option Packages (POPs)

Dear Chair Robin McArthur, Vice-Chair Anyeley Hallová, and Members of the Commission:

The Oregon Chapter of the American Planning Association (OAPA) is an advocate for Oregon's planning program. One of our Legislative Priorities is to support increased funding and technical resources for local, regional, and state agencies engaged in planning work, including the Department of Land Conservation and Development. OAPA generally supports the proposed POPS with specific comments below. We encourage the Commission to be receptive to adjustments to the POPs to ensure that they provide the needed resources.

OAPA is a nonprofit membership organization of over 800 planners that 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 is especially interested in supporting POPs that support our other Legislative Priorities:

- Promote equitable community engagement
- Advance racial equity
- Confront climate change
- Address the housing crisis
- Promote equitable resiliency and recovery

POP 201 – Equitable Community Engagement Including Rulemaking or Goal Revision

OAPA strongly supports this POP to address Goal 1. As practitioners we are well aware of the consequences of relying on a Goal that reflects the times it was adopted (1975) and which has never been amended or had rulemaking. We believe this POP is needed to:



- Explicitly elevate the voices of communities of color and other traditionally underrepresented or excluded groups and ensure they have the opportunity to participate in land use planning and decision making;
- Require equal and fair notice to Native American tribes and tribal communities and provide consultation and mutual concurrence when land use decisions impact lands and natural resources that are owned or managed by a tribal government;
- Incorporate practices to engage all members of the affected community on climate justice, environmental justice and equity in land use and planning decisions; and
- Incorporate modern technologies and mediums to enhance access to information and improve communication between local government and the public, including disadvantaged groups.

OAPA looks forward to supporting this POP and to working with the Commission on the subsequent project.

POP 202 – Wildfire Adapted Communities

OAPA supports this POP and agrees that it is critical to support implementing changes to state and local land use planning programs that will better protect Oregon communities from wildfire. There is an increased urgency to ensure all Oregon’s communities can withstand and bounce back from natural hazards and other disasters, with an emphasis on minimizing vulnerability. We believe this is needed to:

- Promote equitable integrated strategies at the state and local level to reduce risk and improve the ability of all individuals, communities, economic systems, and the natural and built environments to withstand, recover from, and adapt to changes from natural hazards, climate change, human-made disasters, and economic shifts.
- Reduce barriers to equitable local innovations that increase community resilience and facilitates smart rebuilding in fire-damaged communities, making them less vulnerable to future disasters.
- Fund the planning and development of infrastructure.
- Advance environmental justice to address inequities and prioritizing vulnerable communities in recovery and resiliency strategies.

POP 203 – Climate-Friendly And Equitable Communities

OAPA strongly supports this POP. As participants in the rulemaking we know that it is critical that this POP provide the resources necessary to support the local implementation of the updated Transportation Planning Rule on an urgent and as quick as reasonable timeframe. Implementation will have multiple benefits including:

- Reduced greenhouse gas (GHG) emissions through integrated land use and transportation planning; resource



- Increased equitable access to and investment in transit and active pedestrian and bicycle and micro-mobility transportation projects;
- Promoting housing in connected, complete communities – close to quality schools, jobs, services, food and household necessities, cultural centers, places of worship, recreation, open space – with convenient access to transit and other transportation options.
- Promoting equitable participation and outcomes.

POP 204 – Regional Housing Needs Analysis (RHNA)

OAPA strongly supports this POP. There is a housing crisis in Oregon, and it is critical that efforts continue to increase housing availability, affordability, and choices for Oregonians across the state. We believe this project should work to:

- Preserve or increase the supply of housing that is affordable to moderate- to lower-income residents, including rental and ownership opportunities.
- Increase funding and technical assistance to communities to help meet their housing needs, including adequate funding for water and sewer infrastructure.
- Promote housing stability and mitigate or minimize the displacement of residents, with attention to historically and systematically marginalized communities.

POP 205 – Rural Transportation Equity

OAPA strongly supports this POP. Our understanding of the project is that it will support rural community outreach and engagement to underserved and transportation disadvantaged communities. And that it will focus on aligning enhanced equity and safety goals with upcoming State and Federal funding for walking, biking, and transit. Well-planned, equitable, efficient, and resilient transportation infrastructure is the backbone of vibrant communities for all and it is important that active transportation is not just focused on Oregon’s Metropolitan areas but also focused on Oregon’s rural areas.

POP 206 – Habitat Infrastructure Grant Program Coordinator

OAPA supports this POP as confronting climate change by resource and habitat preservation, protection and enhancement as well as taking steps that ensures that the planning program works to achieve the objective of arresting and reversing climate change. We look forward to learning more about the POP and staff’s thoughts regarding “considering needs for renewable wind energy planning along the Oregon Coast.”

POP 207 – Industrial Lands

This project appears to be a new initiative as it is, unlike the other POPs, not included in the Department’s 2021-2023 Policy Agenda. As we understand the project this funding would support a DLCDD staff person to work on a project being proposed by Business Oregon. OAPA asks the Commission to pose questions and request information of staff on aspects of the project. What is the descriptive of the POP and of the project that



Business Oregon is proposing? OAPA certainly supports State assistance for developing existing planned industrial areas especially in addressing infrastructure. Would the project focus on those lands? Or could it lead to UGB expansions? And how will the project address climate change and equity impacts?

Additionally there are two projects (as described below), both related to confronting climate change, that OAPA would ask the Commission to discuss with staff if POP funding is needed or should be considered.

Climate Action Plan. This project is on the 2021-2023 Policy Agenda and as describe would have the Department staff: “examine current policies, practices, and guidance to identify opportunities to address climate change within the existing land use planning program ... the rapid speed of climate change demands that DLCD complete the assessment and implement the action plan as soon as possible so that we can effectively advise state agencies and local government to act towards development and conservation practices that assure livability and wellbeing for all residents given future climatic conditions ... the Climate Action plan will account for the fact that climate change will affect different populations differently, with currently underserved, under-represented, and medically fragile people feeling the effects first and worst.”

Will this project be done using existing funding or does it need new funding?

Updating the State Planning Goals for Climate Change. The Department had on its 2019-2021 Policy Agenda and then on its Governor’s EO-20 for Climate work plan a project to “scope whether and how the Statewide Planning Goals and other implementing rules can be revised to incorporate climate mitigation, adaptation and sequestration ... DLCD plans to invite consultation with Oregon’s nine Tribal nations and host several meetings with stakeholders to discuss whether the Statewide Planning Goals should be revised to reflect climate issues, what public process is appropriate for revising goals, what types of data or research would be useful, and how to fund potential future work. The findings and next steps would be summarized in a short white paper.” The project was dropped due to pandemic related required budget cuts and subsequently not revised.

Should the project be considered for new funding or could it be included as part of the Climate Action Plan work?

OAPA looks forward to continuing to support the Commission and Departments’ budget to work on important issues and especially those that promote equitable community engagement; advance racial equity; confront climate change; address the housing crisis; and promote equitable resiliency.



OAPA thanks the Commission for its time and consideration of this testimony.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Aaron Ray', is positioned above the name.

Aaron Ray, AICP, President
Board of Directors

A handwritten signature in blue ink, appearing to read 'Eunice Kim', is positioned above the name.

Eunice Kim, AICP, Chair
Legislative and Policy Affairs Committee