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Land Conservation and Development Commission
Dept. of Land Conservation & Development
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Salem, OR 97301

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We appreciate the opportunity to comment again on the semi-final draft SB1011 rule governing the designation of rural and urban reserves in the Portland-Metro region.

We generally support the proposed SB1011 rule and believe it will provide better protection for both agricultural lands and natural landscape features in UGB expansion decisions. We believe past UGB decisions have been less than optimal for the region because they have failed to consider both natural and working landscapes- (natural landscape features, forest lands, agricultural lands) as complementary elements of the region's sense of place and ecological sustainability. To that end, SB1011 and the proposed SB1011 rule are an improvement.

However, the proposed SB1011 rule continues to set a higher bar for including high value farmland in urban reserves without comparable provisions for high value natural landscape features. We believe this imbalance- coupled with a lack of adequate policies and tools to ensure the protect environmentally sensitive lands brought into UGBs- will continue put species, habitats, and other public values in greater jeopardy to degradation and loss from urbanization. Our hope in this new approach is that natural features most vulnerable to adjacent and surrounding urbanization can be better addressed in a reserve designation process that will be less determined by soil-types and therefore result in outcomes based on the much better information we now have on the quality and location of critical habitat lands in the northern Willamette Valley.

We have identified two specific and relatively minor changes since the last working group meeting on January 7 that we feel are important to clarify the intent of the Rule Working Group and SB1011.

1.) Language requiring the consideration of impacts of designating urban reserves on adjacent natural landscape features was incorporated into to section **660-027-0050 (1)(h)**. However the way they were added implies that consideration will only be given to natural landscape features on adjacent "resource land." We feel that the intent was to consider impacts on any important natural landscape feature whether located on "resource land" or not. Therefore we support changing the **660-027-0050 (1)(h)** to read:

Can be designed to avoid or minimize adverse effects on farm and forest practices on nearby resource land and on important natural landscape features, including land designated as rural reserves.

This change is critical to ensure that the designation of urban reserves considers the ecological impacts of encroaching on all natural features especially that support sensitive species or rare and unique habitats threatened by adjacent or surrounding urbanization.

2.) Clarification of SB1011. Bob Rindy pointed out to me after the last Work Group meeting that the phrasing in the second sentence in definition of "Important Natural Landscape Features" unintentionally implies that only some of landscape features (specifically "historic, cultural, or other geographic features") are "geographic features" that help "define and distinguish the region." The intent was that all important natural landscape features could help "define and distinguish the region." Therefore we support the following changes to 660-027-00100 (6) in order clarify the definition and make it more consistent with the language in SB1011:

"Important natural landscape features" means landscape features that limit urban development or help define appropriate natural boundaries of urbanization, and that thereby provide for the long-term protection and enhancement of the region's natural resources, public health and safety, and unique sense of place. These features include, but are not limited to, plant, fish, and wildlife habitat; corridors important for ecological, scenic, and recreational connectivity; steep slopes, floodplains, and other natural hazard lands; areas critical to the region's air and water quality; historic and cultural sites; or other landscape features that define and distinguish the region."

Thank you for your consideration.

Sincerely,



Jim Labbe
Urban Conservationist
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