

Date: January 10, 2008

To: Chair VanLandingham and Land Conservation and Development Commission

Re: Draft Administrative Rules for Metro Area Urban and Rural reserves, pursuant to SB 1011

From: Carol Chesarek, on behalf of Forest Park Neighborhood Association
13300 NW Germantown Road
Portland, OR 97231

Chair VanLandingham and Members of the Committee,

I appreciate the opportunity to comment on the January 8 draft of the proposed new OAR 660, Division 27 for Urban and Rural Reserves in the Portland Metropolitan Area.

I live in Portland's Forest Park Neighborhood, which includes the 5000 acres of Forest Park and a broad swath of the Tualatin Mountains. Forest Park Neighborhood Association (FPNA) has closely followed SB 1011 and the Administrative Rules process, and these comments are from the neighborhood. I testified about our strong support for SB 1011 during the Oregon Senate and House hearings earlier this year, and about the draft rules at your November hearing in Corvallis. I have attended all of the rules meetings held by Metro and the workgroup.

FPNA wants to protect the regionally significant natural resources in our area, and we are hopeful that this new Urban and Rural Reserves process will save us from fighting UGB expansion battles every 5 years.

I want to thank Commissioner Worrix for her thoughtful leadership of the workgroup. She ensured that everyone was given a fair hearing and that discussions were effective. She led the group through difficult issues to a successful outcome. Staff was well informed and thorough and we compliment them on their work too.

Overall we're very pleased with the draft rules and the cooperative effort that went into crafting this carefully balanced reserves process. We want to reiterate our strong support for 660-027-0050 Urban Reserve designation factors (e), (g), and (h) that help protect natural features and agricultural lands from urban impacts. The new requirement in 660-027-0070 (5) about planning urban reserves in a manner consistent with the Urban Reserve factors is an excellent addition that will help ensure that new urban development creates livable communities.

We would like to suggest, again, a broader definition of the term "Walkable" that includes a broader range of community destinations and activities. The suggested additions are shown here in bold. We offered this comment in our November testimony, but the workgroup didn't have time to consider the suggestion.

660-027-0010 (12) "Walkable" means a community in which land uses are mixed, built compactly, and designed to provide residents, **employees, and others** with safe and convenient pedestrian access to **parks and recreation facilities, libraries**, schools, offices, businesses, and other places that provide goods and services **that are used** on a regular basis.

We thank everyone who contributed to this very thorough and well considered process, and we hope you will adopt these rules without significant changes (but with, of course, the minor additions we've suggested).

Thank you again for the opportunity to provide these comments.

Carol Chesarek, for Forest Park Neighborhood Association

Carol Chesarek

