

**From:** [PUNTON Amanda \\* DLCD](#)  
**To:** [Stuart I. Cowie](#)  
**Cc:** [LEBOMBARD Josh \\* DLCD](#); [Liam Bean](#)  
**Subject:** RE: City of Roseburg - UGB Exchange Last Call  
**Date:** Wednesday, December 20, 2023 5:06:00 PM

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Stu,

I appreciate your questions and commitment to incorporating this Goal 5 piece into planning for future annexation and development of the area.

I hope you have a fun and restful break over the holidays.

Amanda



**Amanda Punton**

Natural Resource Specialist | Community Services Division  
Cell: 971-718-3245 | Main: 503-373-0050  
[amanda.punton@dlcd.oregon.gov](mailto:amanda.punton@dlcd.oregon.gov) | [www.oregon.gov/LCD](http://www.oregon.gov/LCD)

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**From:** Stuart I. Cowie <[SCowie@cityofroseburg.org](mailto:SCowie@cityofroseburg.org)>  
**Sent:** Wednesday, December 20, 2023 4:28 PM  
**To:** PUNTON Amanda \* DLCD <[Amanda.PUNTON@dlcd.oregon.gov](mailto:Amanda.PUNTON@dlcd.oregon.gov)>  
**Cc:** LEBOMBARD Josh \* DLCD <[Josh.LEBOMBARD@dlcd.oregon.gov](mailto:Josh.LEBOMBARD@dlcd.oregon.gov)>; Liam Bean <[LBean@cityofroseburg.org](mailto:LBean@cityofroseburg.org)>  
**Subject:** RE: City of Roseburg - UGB Exchange Last Call

Hi Amanda,

Thank you for this information. This is really helpful. We will revise the language to include the edits you provided to the paragraph added to page 161 and plan for the LWI in the new area once the UGB swap is approved and prior to land being annexed. Thanks for the quick response.

Have a great Christmas and happy New Year!

Stu

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**From:** PUNTON Amanda \* DLCD <[Amanda.PUNTON@dlcd.oregon.gov](mailto:Amanda.PUNTON@dlcd.oregon.gov)>  
**Sent:** Wednesday, December 20, 2023 3:07 PM  
**To:** Stuart I. Cowie <[SCowie@cityofroseburg.org](mailto:SCowie@cityofroseburg.org)>  
**Cc:** LEBOMBARD Josh \* DLCD <[Josh.LEBOMBARD@dlcd.oregon.gov](mailto:Josh.LEBOMBARD@dlcd.oregon.gov)>  
**Subject:** RE: City of Roseburg - UGB Exchange Last Call

Hi Stu,

See below for answers to your questions. For some background, when the Goal 5 rules were adopted in 1996, it was assumed that all cities would complete LWI's inside their UGB's within a few years. These inventories would be added to when UGBs were expanded. When the legislature

removed periodic review for most cities and all counties, the ability to apply OAR 660-023-0100 (and some other rules) uniformly was lost but the UGB expansion trigger for LWIs was maintained.

Feel free to call if I did not sufficiently answer your questions.

Amanda



**Amanda Punton**

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**From:** LEBOMBARD Josh \* DLCD <[Josh.LEBOMBARD@dlcd.oregon.gov](mailto:Josh.LEBOMBARD@dlcd.oregon.gov)>

**Sent:** Wednesday, December 20, 2023 1:25 PM

**To:** PUNTON Amanda \* DLCD <[Amanda.PUNTON@dlcd.oregon.gov](mailto:Amanda.PUNTON@dlcd.oregon.gov)>

**Subject:** FW: City of Roseburg - UGB Exchange Last Call

Amanda,

Could you take a shot at answering Stu's comments below? Not sure if you'll be able to answer the question about owner consent. That may need to go to Jevra.

Feel free to respond directly to Stu and cc: me.

Thanks,  
Josh



**Josh LeBombard**

Southern Oregon Regional Representative | Community Services Division  
Pronouns: He/Him/His  
Oregon Department of Land Conservation and Development  
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**From:** Stuart I. Cowie <[SCowie@cityofroseburg.org](mailto:SCowie@cityofroseburg.org)>

**Sent:** Wednesday, December 20, 2023 12:04 PM

**To:** LEBOMBARD Josh \* DLCD <[Josh.LEBOMBARD@dlcd.oregon.gov](mailto:Josh.LEBOMBARD@dlcd.oregon.gov)>; Liam Bean  
<[LBean@cityofroseburg.org](mailto:LBean@cityofroseburg.org)>

**Subject:** RE: City of Roseburg - UGB Exchange Last Call

Hi Josh,

A couple of questions for you on this. If I need to go directly to Amanda I can do that also. I'm not concerned about the semantics of an LWI as compared to a delineation. Our idea of a delineation I

think is the same as what is being requested for an LWI, but I'm still struggling with where it indicates that an LWI is necessary for the entirety of the area being pulled into the new UGB area.

- It's not as if we have to do some other type of inventory for sensitive land or natural resource features. Why wetlands? Is there some specific state law that speaks to this that you could point me too? UGB expansions trigger the application of the Goal 5 rules, OAR 660-023-0250(3). (3)(c) speaks of factual information submitted during review of the PAPA to expand the UGB. The record for this PAPA includes information on the presence of wetlands so application of OAR 660-023-0100 is required. The Goal 5 protection process starts with a local wetlands inventory and concludes with local protections being adopted for significant wetlands.
- If we were to annex property into another portion of the existing UGB we wouldn't have to do an LWI for that portion of land. Why here? I don't know the history of the city's other UGB areas. If they were added to the UGB prior to September 1996, division 23 would not have been in effect. If they were added after this date, maybe no one looked for wetlands, or maybe the requirements of division 23 were overlooked.

My concerns don't stem from an issue with wetlands, I understand and recognize the need and desire to have them inventoried, rather the time and cost associated with the study and the legal access necessary to obtain from over a hundred different property owners. Not all properties are going to be annexed upon completion of the UGB swap. Annexation will happen organically over time as existing water main lines are upgraded and a new sewer main is extended into the area. After a while island annexations will occur, but that will take time. We will not do an LWI based on properties being annexed here a little there a little. Instead upon completion we would look at performing a larger study for the entirety of the area.

- My concern is that if not all property owners give us permission to inventory their property, which I'm sure there will be many, how do we accomplish the study? The steps for completing an LWI are described in DSL rules. The city is required to send notice to property owners and request permission to access their property for the fieldwork part of the inventory process. However, access is not required to complete an LWI. Wetland biologist can view areas from public rights of way and use existing maps and data to inform the inventory.

On another note, have you heard anything from Kevin Young about the other section we provided more findings around? The section had to do with evaluating exception lands within each of the three final study areas.

Stu

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**From:** LEBOMBARD Josh \* DLCD <[Josh.LEBOMBARD@dlcd.oregon.gov](mailto:Josh.LEBOMBARD@dlcd.oregon.gov)>

**Sent:** Tuesday, December 19, 2023 11:41 AM

**To:** Liam Bean <[LBean@cityofroseburg.org](mailto:LBean@cityofroseburg.org)>

**Cc:** Stuart I. Cowie <[SCowie@cityofroseburg.org](mailto:SCowie@cityofroseburg.org)>

**Subject:** FW: City of Roseburg - UGB Exchange Last Call

Liam,

See the comments below.

Cheers,  
Josh



**Josh LeBombard**

Southern Oregon Regional Representative | Community Services Division  
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Oregon Department of Land Conservation and Development  
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**From:** PUNTON Amanda \* DLCD <[Amanda.PUNTON@dlcd.oregon.gov](mailto:Amanda.PUNTON@dlcd.oregon.gov)>  
**Sent:** Monday, December 18, 2023 6:15 PM  
**To:** LEBOMBARD Josh \* DLCD <[Josh.LEBOMBARD@dlcd.oregon.gov](mailto:Josh.LEBOMBARD@dlcd.oregon.gov)>  
**Cc:** YOUNG Kevin \* DLCD <[Kevin.YOUNG@dlcd.oregon.gov](mailto:Kevin.YOUNG@dlcd.oregon.gov)>; FOOTE Hilary \* DLCD <[Hilary.FOOTE@dlcd.oregon.gov](mailto:Hilary.FOOTE@dlcd.oregon.gov)>  
**Subject:** RE: City of Roseburg - UGB Exchange Last Call

Hi Josh,

There is still confusion between a LWI and a delineation. I offer the following edits to the paragraph added to page 161 of the Draft Report and Findings.

The City shall ensure that all DSL and DLCD requirements relating to wetland conservation and protection are fulfilled. ~~by requiring that~~ **A local wetlands inventory will be submitted to DSL for properties within the newly expanded area of the UGB undergo an independent wetland delineation. DSL approval of the LWI is required prior to the annexation of any portion of those properties the expansion area** into the Roseburg city limits. Local protections will be applied to significant wetlands, consistent with OAR 660-023-0100(4).



**Amanda Puntun**

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**From:** LEBOMBARD Josh \* DLCD <[Josh.LEBOMBARD@dlcd.oregon.gov](mailto:Josh.LEBOMBARD@dlcd.oregon.gov)>  
**Sent:** Monday, December 18, 2023 2:23 PM  
**To:** YOUNG Kevin \* DLCD <[Kevin.YOUNG@dlcd.oregon.gov](mailto:Kevin.YOUNG@dlcd.oregon.gov)>; FOOTE Hilary \* DLCD <[Hilary.FOOTE@dlcd.oregon.gov](mailto:Hilary.FOOTE@dlcd.oregon.gov)>; PUNTON Amanda \* DLCD <[Amanda.PUNTON@dlcd.oregon.gov](mailto:Amanda.PUNTON@dlcd.oregon.gov)>  
**Subject:** FW: City of Roseburg - UGB Exchange Last Call

See the link below to the city's revised proposal. The major changes are on pages 117-119 (land

prioritization) and 161 (LWI).

Let me know if you have any comments/questions.

Cheers,  
Josh



**Josh LeBombard**

Southern Oregon Regional Representative | Community Services Division

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**From:** Liam Bean <[LBean@cityofroseburg.org](mailto:LBean@cityofroseburg.org)>

**Sent:** Wednesday, December 13, 2023 2:36 PM

**To:** LEBOMBARD Josh \* DLCD <[Josh.LEBOMBARD@dlcd.oregon.gov](mailto:Josh.LEBOMBARD@dlcd.oregon.gov)>

**Cc:** Stuart I. Cowie <[SCowie@cityofroseburg.org](mailto:SCowie@cityofroseburg.org)>; Mark Moffett <[MMoffett@cityofroseburg.org](mailto:MMoffett@cityofroseburg.org)>;

Andy Blondell <[ABlondell@cityofroseburg.org](mailto:ABlondell@cityofroseburg.org)>

**Subject:** City of Roseburg - UGB Exchange Last Call

You don't often get email from [lbean@cityofroseburg.org](mailto:lbean@cityofroseburg.org). [Learn why this is important](#)

Hey Josh!

Thanks for getting back to us with that information from Kevin. [Linked here](#) is our penultimate draft of the UGB swap, after this draft is reviewed we plan to move forward with our public process and to proceed with our application. If you could distribute it to the folks at DLCD whose comments we addressed in our last few revisions we would appreciate it. While several small amendments have been made which are not called out in the draft (primarily to correct errors in maps and address spelling and grammar errors) the new sections addressing the last round of comments are currently highlighted in a reader friendly red font.

On pages 117-119 you will find an additional narrative relating to the exception lands within our other candidate areas. This narrative addresses how these non-resource lands still present challenges to the City in extending urban services in the next 20 years due to prohibitive location factors, and how expanding the UGB to include the non-resource lands across multiple candidate areas shall result in several unwieldy linear features that will promote suburban sprawl instead of compact urban development. On page 161 you will find the addition of a short paragraph detailing the City's commitment to ensuring a wetland delineation occurs in the Charter Oaks area prior to City annexation of any parcels that would be included in the newly expanded UGB. If there are additional comments related to these sections we will be happy to make the needed updates to our application before holding our first public meeting.

I want to close with this, thank you for working so closely with us on this project! I know that I came in on the tail end of this long process, but your diligence in helping us navigate the waters of the OAR and your commitment to making sure Roseburg can put together a successful application are evident. I know our whole staff, past and present, have really appreciated your help throughout. I know I said it not two sentences ago, but it has taken a long time to get there and we thank you immensely for your support!

--

Regards

**Liam F. Bean** (He/Him)

*Associate Planner*

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<https://www.cityofroseburg.org/storage/app/media/CDD/UGB%20Exchange/Roseburg%20UGB%20Exchange-Final-12-13-23.pdf>

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