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2 February, 2021

Chair Van Voorhies, and Members  
Central Point Planning Commission  
c/o Stephanie Holtey, Planning Director  
140 S. 3<sup>rd</sup> Street  
Central Point, OR 97528

Re: Central Point Urban Growth Boundary Proposal, File No. CPA-19001

Dear Chair Van Voorhies and members of the Central Point Planning Commission:

Thank you for the opportunity to provide comments on the proposed expansion of the Central Point Urban Growth Boundary (CPA-19001). 1000 Friends of Oregon is a non-profit organization dedicated to working with Oregonians to support livable communities. Our membership includes Central Point and Jackson County residents who support the mission and values of the Oregon land use program.

We support your efforts to plan for your community's long range needs. 1000 Friends was deeply involved in the Regional Problem Solving (RPS) planning process that resulted in creation of the urban reserves that are the subject of some of this work. We have also closely followed the work of revising the elements of the Comprehensive Plan upon which this proposal is based, and participated in the 2014 and 2015 minor amendments to the UGB which resulted in adding parts of the Greenway and industrial land at the Seven Oaks interchange to the UGB. I have personally appreciated the professionalism and transparency with which your staff has conducted this work.

We want to recognize that Central Point faces many challenges when considering whether and how to expand its boundaries. The city is bounded on two sides by the city of Medford, and on the other two sides by some of the most productive farm soils in the valley (west and a bit north) and wetlands (north). These factors combine in the result that, if the city is going to expand it has no choice but to expand onto farm soils.

While expanding onto farm soils is seen as a last resort under Oregon law, it is permissible in circumstances like this. However, the ability to expand into such lands comes with some responsibilities, not least of which is minimizing the impacts on that farmland using the land that the city urbanizes efficiently. We believe the city has demonstrated that it has used its urban lands efficiently and plans to continue to do so. The history of efficiency measures already taken presented in Table 5 of the Findings of Fact (p. 11), including Central Point's commitment to develop future lands to the highest density committed to by any RPS

community and measures such as the commitment to increase infill participation to meet 20 percent of future housing needs are all good examples of this. And, as staff points out, this is the first comprehensive UGB expansion for the city in 36 years.

The RPS process, which took over 10 years to complete, included a far more rigorous process for identifying and justifying which lands should be urbanized in the future than would happen under a normal UGB proposal process. RPS identified "urban reserves," which by definition become the top priority for future urbanization over all other lands, regardless of zoning or current use. The decision to eventually urbanize that land was made during that process. The current UGB proposal includes only lands that were identified as urban reserves during that process, and as such the proposal meets the criteria around which lands should be prioritized.

All UGB expansions involve tradeoffs. There are some important ones being made in this case. However, based on the above, as well as our history of involvement in Central Point and our review of the materials in the record for this proceeding, we support this proposal. We encourage the city of Central Point and Jackson County to adopt this proposed UGB expansion, along with the conditions proposed by staff.

We look forward to working with the City in the future as the plan is implemented.

Thank you for your consideration of these comments. Please place these comments in the record for this proceeding, and notify me of further actions in this proceeding and any decisions at the Grants Pass address above.

Respectfully,

A handwritten signature in black ink, appearing to read "Greg Holmes", written in a cursive style.

Greg Holmes  
Food Systems Program Director and  
Southern Oregon Advocate,  
1000 Friends of Oregon