



American Planning Association
Oregon Chapter

Creating Great Communities for All

May 19, 2021

Robin McArthur, Chair
Oregon Land Conservation and Development Commission
635 Capitol Street NE, Suite 150
Salem, OR 97301-2540
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RE: May 20, 2021 Agenda Item No. 9: Testimony from the Oregon Chapter of the American Planning Association on Wildfire Rules Temporary to Permanent

Dear Chair McArthur and Members of the Commission:

The Oregon Chapter of the American Planning Association (OAPA) provides the following comments on the proposed rules on your May 20, 2021 agenda. The Commission adopted a set of temporary rules for the purpose of responding to the catastrophic wildfires of 2020 that amended six (6) divisions of the Oregon Administrative Rules (OAR) on October 20, 2020, including Division 4, 6, 11, 14, 12, and 33. The proposed amendments before you carry forward these temporary rules and in some instances augment them. OAPA offers these comments in alignment with our Chapter's Policy Priorities, one of which is to "Promote and Advocate for an Oregon planning program that works for all communities to create and stabilize places that are equitable, healthy, and resilient and provide ongoing economic, environmental, and social benefits." Thank you for the opportunity to comment.

OAPA has reviewed the draft rules, supports the recommendation outlined in the May 6, 2021 Staff report, and offers the following as proposed technical comments and feedback:

1. Regarding retiring or decommissioning structures: OAPA agrees but also recommends leaving specifics to local permitting jurisdictions.
2. Regarding disaster recovery declarations: OAPA recommends only one gubernatorial disaster recovery declaration should be required.

OAPA is an independent, statewide, not-for-profit educational organization of more than 800 planners from across the state who work for cities, counties, special districts, state agencies, tribes, community-based organizations, universities, and private firms. We provide leadership in the development of vital communities by advocating excellence in community planning, promoting education and resident empowerment, and providing the tools and support necessary to meet the challenges of growth and change. OAPA supports sustainable



communities and works to enhance the quality of life for current and future generations by helping to create and stabilize places that are equitable, healthy, and resilient and provide ongoing economic, environmental, and social benefits.

Thank you again for the opportunity to comment. OAPA looks forward to working with the Commission and Department on implementation.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Aaron Ray'.

Aaron Ray, AICP, President
Board of Directors

A handwritten signature in blue ink, appearing to read 'Eunice Kim'.

Eunice Kim, AICP, Chair
Legislative and Policy Affairs Committee