

EXHIBIT LL



August 6, 2015

Mayor and City Council  
200 South Ivy Street,  
Lausmann Annex, Room 240  
Medford, OR 97501

**CSA Planning, Ltd**

4497 Brownridge, Suite 101  
Medford, OR 97504

Telephone 541.779.0569  
Fax 541.779.0114

Mike@CSAplanning.net

RE: **UGB Amendment / Agricultural Buffering**

Dear Mayor and City Council:

It appears the effects of Agricultural Buffering on land supply were not taken into consideration in the context of the proposed Urban Growth Boundary Amendment (UGBA). Considering the large volume of details that must be considered, it is understandable how such a component may be inadvertently left out. Nonetheless, there are significant potential impacts on availability of land supply as a result of mandatory agricultural buffering that must be taken into consideration.

Medford Land Development Code (MLDC) Sections 10.801 through 10.802 include mandatory buffering provisions for urban lands adjacent to farm lands that the City must consider. This letter is not intended to provide the details necessary for evaluating the relative impacts that agricultural buffering may have on the supply of urban land. Rather, the intent is to point out that the City is obligated to do so.

MLDC 10.8 requires under most circumstances, a minimum agricultural buffer of 100 feet for urban lands next to farm lands. The attached map illustrates a 100-foot buffer for all Planning Commission Recommended lands adjacent to County EFU zoned properties. This area of buffer totals approximately 121 acres. This is likely a conservative number for the MDLC under certain circumstances requires a 200-foot buffer.

Because the acreages of land need being relied upon in the Planning Commission Report are based on gross acreages, the 121 acre estimate noted above is not a direct addition to the total land need. They should instead be factored into the net to the buildable vs unbuildable land supply calculations.

Because some proposed urban lands are adjacent to farm zoned lands and some are not, one must conduct an actual inventory of required buffering on all lands proposed for inclusion. Further, the analysis must not only consider the total areas in proximity to farm land, it must also consider the types of proposed urban land, for different types of lands have different agricultural buffering needs.

It is important to note that buffering requirements for urban lands adjacent to farm zoned lands that remain within Urban Reserves are different than the requirements relevant to urban lands adjacent to farm zoned lands beyond or at the outer limits of the 50-year urban reserve boundaries.

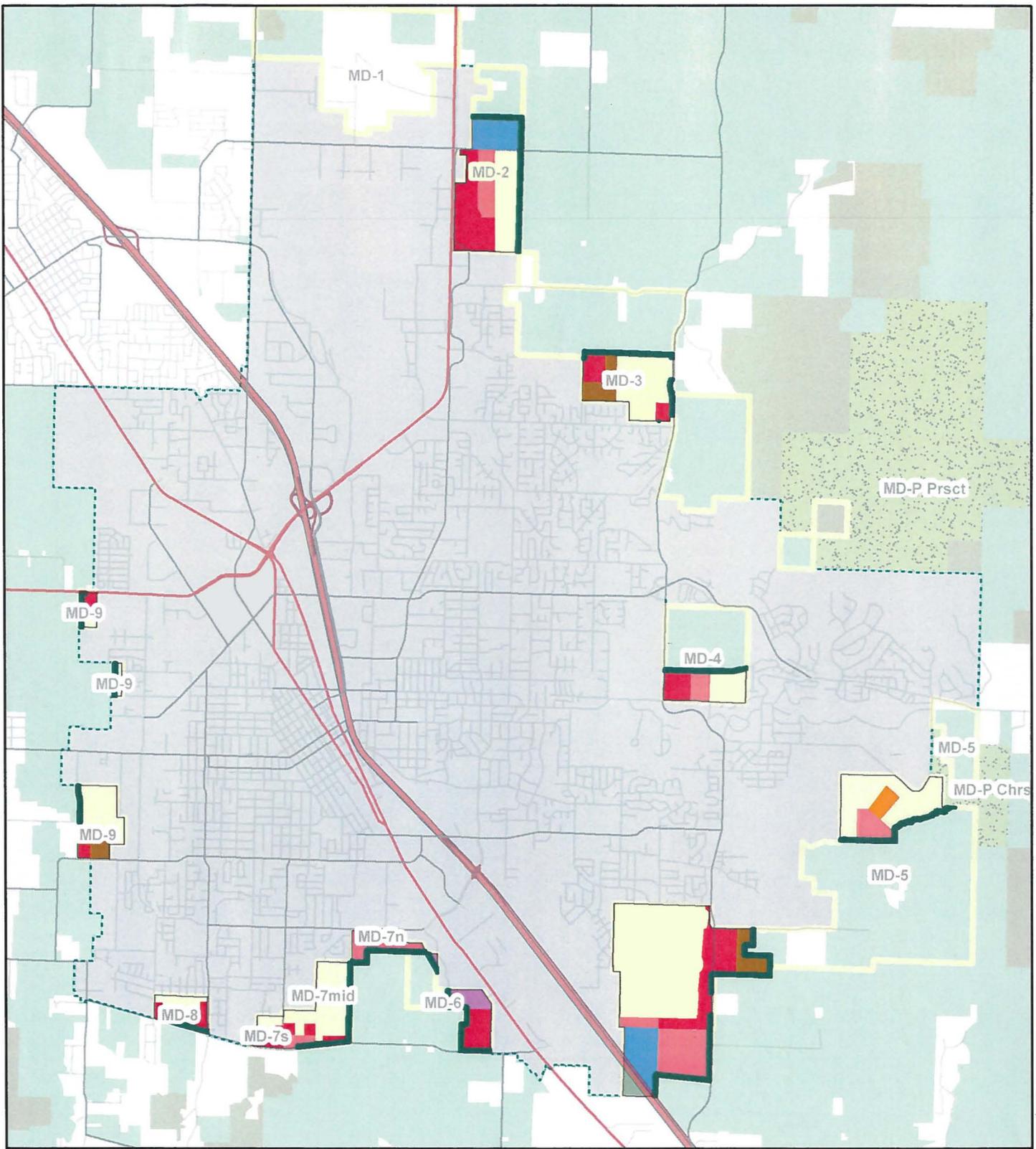
Your consideration of this matter is appreciated.

Very truly yours,

CSA Planning, Ltd.

A handwritten signature in blue ink, appearing to read 'Michael Savage', is written over the typed name.

Michael Savage  
Associate



# Minimum Ag Buffering



- URA
- Urban Growth Boundary
- 100 ft buffer (121 acres\*)
- Exclusive Farm Use (EFU)
- FR; WR; OSR

## PC Recommendation

### Proposed GLUP

- CM
- SC
- HI
- GI
- UH
- UM
- UR
- PS

\* May Require 200-foot Buffer