

## **Background:**

The 1997 SIMC Rural Area Plan included policy language about recreation activities that are “complementary” to natural and environmental resources, so use of the word is not new in this context.

In 2015, a new SIMC Rural Area Plan was developed and adopted by the county. Metro chose not to participate in that process. The SIMC plan included these policies:

**8.9** Continue to coordinate with Metro to ensure compliance with Rural Reserve designations, implementation of Metro’s Greenspaces Master Plan, and planning for Howell Park. In particular, work with Metro to:

Strategy 1. Ensure activities will complement natural and environmental resources of local and regional significance; and

Strategy 2. Ensure that Howell Territorial Park uses and improvements maintain harmony with the rural character of the plan area as well as natural and cultural resources.

**8.10** Support only those recreational activities within the SIMC area that are complementary to and do not negatively impact natural and environmental resources on Sauvie Island and along Multnomah Channel and its tributaries that are identified in Goal 5.

The Comprehensive Plan CAC adapted one of these SIMC policies for the West Hills, making it slightly less restrictive:

**8.8** Support only those recreational activities within the West Hills area that are complementary to, and do not cause undue negative impacts on natural and environmental resources that are identified in Goal 5.

Because Metro expressed written concern that the word “complementary” would prevent any recreation in Goal 5 resource areas, more clarity was needed.

## **Proposal**

We request that the draft Comprehensive Plan be amended to restore the language from the adopted SIMC Plan and that was approved by the CAC. To reassure everyone about the meaning of “complementary,” we are providing definitions of complementary and undue, as well as an a more detailed explanation of the policy intent, to provide assurance that these policies, are not intended to block all recreation in Goal 5 resource areas. Lastly, we ask for an explicit statement that subarea policies control where there is overlap with countywide policies.

These four elements are presented below.

## **1. New Definitions to add**, probably in the glossary:

**Complementary:** *Going together well; working well together; harmonious.*

**Undue:** *Not appropriate, unsuitable.*

We also suggest additional language for Chapter 8 (below) to explain how the definition of *complementary* relates to the parks and recreation policies, making it clear that some recreation can be allowed.

## **2. Clarify relationship between subarea and countywide policies**

We couldn't find a statement in the Comp Plan that makes the relationship between the subarea specific policies and the countywide policies explicit. We've all been assuming that where they overlap the subarea specific policies would control, so we would like to add this statement for clarity:

*Where subarea specific policies apply and overlap with countywide policies, the subarea policies control.*

That sentence could go in Chapter 8, but since there are subarea specific policies in several chapters and it should apply to all of them, we suggest that it be added in Chapter 1, p. 22, in the section about Subareas, near this language:

"Many of those former Rural Area Plan policies and strategies are appropriate to apply to the entire County, while others continue to be unique to specific subareas. This Plan includes narrative information describing unique conditions or circumstances in each of the subareas in order to continue to address the unique attributes of specific subareas."

## **3. Language to add in Chapter 8, Parks and Recreation (in blue):**

### **Key Planning Issues and Supporting Information**

A number of key planning issues affect parks and open space planning policies and practices in the rural portions of Multnomah County:

....

- **Balancing recreational use with protection of natural resources.**

Oftentimes, recreational facilities are located within environmentally sensitive areas where it is important to balance recreation needs with natural resource management and protection objectives, particularly for riparian areas and wildlife habitat. This issue was raised by community members during preparation of this Comprehensive Plan and a number of policies direct the County to balance these two different types of objectives.

In the subarea policies for SIMC and West Hills, while a high bar is intended for recreational development in Goal 5 resource areas, passive recreational and educational

use without degrading natural resources is acceptable. Appropriate opportunities to experience enjoyment of resources can be allowed, to the extent it can be done without impairing them. When there is a conflict between conserving, restoring and enhancing resources and providing for enjoyment of them, the conservation, restoration and enhancement are to be predominant.

## **4. Chapter 8 policy language to be restored to the original versions**

### **GOAL, POLICIES, AND STRATEGIES**

**Goal:** To help meet the recreational needs of Multnomah County rural residents and visitors to its rural areas through support of, and coordination with local, regional, state, and federal agencies that manage recreation facilities and sites within the County.

#### **Policies and Strategies Applicable County-wide**

The policies in this section focus on coordination with other agencies in planning for and providing recreational facilities and services and with balancing recreational needs with goals for natural resource protection. Additional related policies are found in Chapter 5 of this plan and in the County's Transportation System Plan (referenced in Chapter 12).

#### *Parks and Recreation Planning*

8.1 Support efforts of the Intertwine Alliance and other organizations in establishing a coordinated approach to create and maintain a strong, interconnected regional network of parks, trails, and natural areas.

8.2 Encourage the development of recreation opportunities by public agencies and private entities consistent with wildlife habitat and wildlife corridor protection.

8.3 Coordinate with other agencies in strategically siting new public recreational facilities to take advantage of existing infrastructure that allow for multi-modal access opportunities and shared parking. An example would be joint use of park and school facilities by locating them adjacent, or close, to each other.

***Strategy 8.3-1:*** *Include provisions in the Zoning Code for privately owned and operated recreational facilities as conditional uses in appropriate zones.*

8.4 Ensure that the residents of areas outside of the urban growth boundary are represented on parks and open space issues.

***Strategy 8.4-1:*** *Encourage Metro to appoint residents representing different rural areas of Multnomah County to Metro's parks and greenspaces citizens' advisory boards.*

8.5 Consider the impacts of proposed recreation facilities on nearby private properties and require applicants to avoid and minimize significant adverse impacts to nearby properties.

## West Hills Policies and Strategies

8.7 Support the natural systems and recreational values of Forest Park and adjacent areas in concert with the City of Portland, Metro, and other agencies.

*Strategy 8.7-1: Promote and provide incentives for voluntary use of conservation easements and habitat protection by property owners.*

8.8 Support only those recreational activities within the West Hills area that are ~~complementary to consistent with~~, and do not cause undue negative impacts on natural and environmental resources that are identified in Goal 5.

8.9 Continue to coordinate with Metro to ensure compliance with Rural Reserve designations, implementation of Metro's Greenspaces Master Plan, and planning for Howell Park. In particular, work with Metro to:

Strategy 1. Ensure activities will ~~complement be consistent with~~ natural and environmental resources of local and regional significance; and

Strategy 2. Ensure that Howell Territorial Park uses and improvements ~~maintain harmony are consistent with~~ with the rural character of the plan area as well as natural and cultural resources.

8.10 Support only those recreational activities within the SIMC area that are ~~complementary to consistent with~~ and do not negatively impact natural and environmental resources on Sauvie Island and along Multnomah Channel and its tributaries that are identified in Goal 5.



Rithy KHUT <rithy.khut@multco.us>

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## [Comprehensive Plan] Form submission from: Comprehensive Plan and Transportation System Plan - Board of County Commissioners Comment Form

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**Multnomah County** <webmaster@multco.us>  
To: compplan@multco.us

Mon, Aug 1, 2016 at 5:28 PM

Submitted on Monday, August 1, 2016 - 5:28pm  
Submitted values are:

Name: Rena Snyder  
Organization/Affiliation:  
Address: 16705 NW Johnson Rd  
City/State/Zip: Hillsboro, OR 97124  
E-mail address: [rena\\_snyder@msn.com](mailto:rena_snyder@msn.com)

Comments: I have a 35-acre farm on the west side of Skyline ridge. I do not believe my property can be seen from the Sunset corridor or the Sunset Highway. I take strong exception to the SEC-V designation. To assess me for "a view" is beyond reasonable or prudent. It is unconscionable This is agricultural property. I didn't buy this property 25 years ago for the view, I bought it to create an agriculture-based business.

The results of this submission may be viewed at:  
<https://multco.us/node/28556/submission/60902>

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Rithy KHUT <rithy.khut@multco.us>

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## [Comprehensive Plan] Form submission from: Comprehensive Plan and Transportation System Plan - Board of County Commissioners Comment Form

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**Multnomah County** <webmaster@multco.us>  
To: compplan@multco.us

Mon, Aug 1, 2016 at 5:42 PM

Submitted on Monday, August 1, 2016 - 5:42pm  
Submitted values are:

Name: Gabriell Quenneville  
Organization/Affiliation:  
Address: 12845 NW Skyline Blvd  
City/State/Zip: Portland, OR 97231  
E-mail address: [gabe\\_quenneville@msn.com](mailto:gabe_quenneville@msn.com)  
Comments:

County Commissioners,  
I strongly object to the recommendation to the West Hills policy and strategies Chapter 5.47 to expand the significant environmental concern overlay for views to the west slope. The impact to the homeowners with respect to structure restrictions,, increased assessments due to the "view index", increased tax liability, zoning restrictions and overlays is an undue burden. Additionally, it will only affect the view from Washington County which has no view overlay. This change will make living in the West Hills more difficult and expensive and likely make living here untenable for those living on fixed incomes.  
Please do not support this recommendation.  
Thank You  
Gabe Quenneville

The results of this submission may be viewed at:  
<https://multco.us/node/28556/submission/60905>

[Quoted text hidden]

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**William V. Bierek & Heidi M. Bierek**

12006 NW Valley Vista Road  
Hillsboro, OR 97124  
(503) 645-7116  
heidiho7116@gmail.com

*Marie Condit*  
8/3/2016

2nd August 2016

**Multnomah County Board of Commissioners**

501 SE Hawthorne BLVD  
Portland, OR 97214

Subject: SEC-V Designation To Comprehensive Plan Scheduled at 9:30am on  
August 25, 2016 in Board Conference Room 100

Dear Commissioners,

We are against the enactment by you of this proposed designation.

The reasons are:

1. The configuration of northwest Multnomah County is such that all property views south are in Washington County and this is of no benefit to Multnomah County voters and is not within the jurisdiction of this commission.
2. The proposed "View Index" and addition of market value for said increase in our opinion is against current law as the voters of Oregon have enacted limitations to said realty tax increases.
3. The proposal is discriminatory and punitive as it applies only to "Scenic View Properties" and, if passed, subjects owners to penalties, which if imposed, could subject property owners to monetary fines and possible jail if violated and is therefore, unconstitutional under Oregon and U.S. constitutions as "Ex Post Facto" among other constitutional violations.
4. The proposal is completely illogical but from our experience your commission has done enactments such as:
  - (a) Enactment of water quality standards and inspections of rental properties in rural Multnomah County where at a hearing overlays were presented by your staff of NW Multnomah

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County showed no contamination or illnesses by contaminated water in that area. I mentioned this at the hearing at Sauvies Island school with all other property owners present objecting. It passed and then I had to write a letter saying we have never rented a structure on our property.

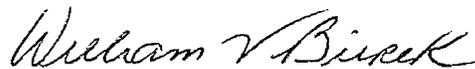
- (b) The Fred Bender episode where your commission withdrew 6 building permits contiguous to our property and he appealed and spent nearly \$500,000 and your decision was reversed and 6 houses were subsequently built and the county received substantial taxes from same.

5. I would suggest this commission should consider instead:

- (a) Assisting Portland in the "Homeless" matter;
- (b) Assisting Portland in the union caused problem with terminal 6 in the Port of Portland;
- (c) In examining the westside rail problems, costs and possible termination.

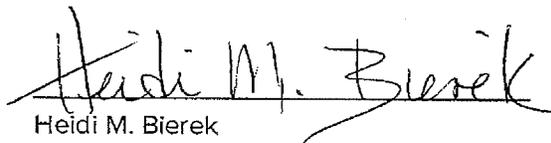
We have lived in our location since 1975 and have dutifully paid our taxes as have other owners. Our property should not be servient to Washington County residents and we believe this measure is primarily for political reasons. We are deeply disappointed and you should be ashamed for what is proposed.

Respectfully submitted,



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William V. Bierek



Heidi M. Bierek

cc: Oregonians in Action  
John L. Scott, Realtors



Rithy KHUT <rithy.khut@multco.us>

**[Comprehensive Plan] Form submission from: Comprehensive Plan and Transportation System Plan - Board of County Commissioners Comment Form**

Multnomah County <webmaster@multco.us>  
To: compplan@multco.us

Wed, Aug 3, 2016 at 9:46 PM

Submitted on Wednesday, August 3, 2016 - 9:46pm  
Submitted values are:

Name: Katharine van der Hoorn  
Organization/Affiliation: Ms.  
Address: 16377 NW Johnson Rd  
City/State/Zip: Hillsboro, OR 97124  
E-mail address: [katharine.vanderhoorn@gmail.com](mailto:katharine.vanderhoorn@gmail.com)

Comments:

Hello,

I am writing to share my profound displeasure with everything I have read about the Multnomah County Comprehensive Plan. As a farm owner with a farm in rural Multnomah County, it seems that with the "environmental overlay" and new restrictions on Forestry properties, there is absolutely no consideration whatsoever of the needs of actual property owners, and rather there is a highly theoretical benefit to those who do not live in our area or have any concept of the challenges we face. From what we have read of the environmental overlay, it seems that there will be new restrictions on buildings, as well as potential higher property taxes, which are already outrageously high. Most of us moved to a rural setting so as to escape the restrictions imposed by HOAs and condo boards, and yet these new proposed restrictions will treat our properties as if they are solely for the benefit of those who live in the city and for their views. It seems that you have not in any way consulted those of us who actually live in Rural Multnomah County, contribute to our local communities with raising food and keeping Rural Multnomah county character, and instead have relied on your ideals of a perfect pastoral fantasy that is not the financial or vocational reality for us.

Thank you for considering our comments, and please do not add the environmental overlay and additional property restrictions to Rural Multnomah County.  
Katharine van der Hoorn

The results of this submission may be viewed at:  
<https://multco.us/node/28556/submission/61035>

[Quoted text hidden]



Rithy KHUT <rithy.khut@multco.us>

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## [Comprehensive Plan] Form submission from: Comprehensive Plan and Transportation System Plan - Board of County Commissioners Comment Form

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Multnomah County <webmaster@multco.us>  
To: compplan@multco.us

Wed, Aug 3, 2016 at 12:50 PM

Submitted on Wednesday, August 3, 2016 - 12:50pm  
Submitted values are:

Name: Carol Reifsteck  
Organization/Affiliation:  
Address: 11557 NW PLAINVIEW RD  
City/State/Zip: Portland, OR. 97231  
E-mail address: [extex55@gmail.com](mailto:extex55@gmail.com)  
Comments:

I am very concerned about the rezoning in your proposal. I'm first upset because the only reason I know about it is due to a realtor in Beaverton and not the Board which has as its vision: " community knows about and is engaged in what we do" and also to be transparent. This area you are talking about is rural/residential and is why we bought the house. This new proposal would limit tree cutting which would affect Christmas tree businesses as well as the farming areas. Why would you want to have Multnomah county pay taxes for the "view" of Washington county residents? I can only assume there is really another, unspoken point to all this like maybe increase taxes here in an area that can't vote? Lobbying by realtor associations? It would be greatly appreciated if your Board would be truly transparent and inform the people affected by this proposal what you are doing and meet your Mission/Vision goals. Your current method is NOT working. Thanks for your time.

The results of this submission may be viewed at:  
<https://multco.us/node/28556/submission/61002>

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Rithy KHUT &lt;rithy.khut@multco.us&gt;

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**[Comprehensive Plan] Fwd: comprehensive plan comments**

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**Rick.Jansen@comcast.net** <Rick.Jansen@comcast.net>  
To: compplan@multco.us

Wed, Aug 3, 2016 at 3:46 PM

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**From:** "Rick Jansen" <Rick.Jansen@comcast.net>  
**To:** "rich faith" <rich.faiht@multco.us>  
**Sent:** Wednesday, August 3, 2016 12:16:32 PM  
**Subject:** comprehensive plan comments

Mr. Faith,

I have just received a letter from a local realtor stating that the new Comprehensive Plan being studied includes a section for significant environmental concern-view. The letter further states that a view index is assigned to properties and that each level of the index adds an additional amount to the property's assessed value. The amounts given in the letter are not insignificant as they top out at \$150,000. I have followed the progress of the new plan through fliers sent by the County. However, I have not seen any mention of view index or increase of assessed property values. I went to the County's comprehensive plan website and could not find any mention of these concerns. Would you please verify if the claims made in the realtor's letter are valid and if so where I can see the entire plan? The letter states that time is of the essence. If these claims are true and the County is considering adding to the assessed value of my property due to view I cannot agree with the plan. Thank you in advance for your help.

Sincerely,  
Rick Jansen

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Rithy KHUT <rithy.khut@multco.us>

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## [Comprehensive Plan] Form submission from: Comprehensive Plan and Transportation System Plan - Board of County Commissioners Comment Form

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**Multnomah County** <webmaster@multco.us>  
To: compplan@multco.us

Thu, Aug 4, 2016 at 7:49 AM

Submitted on Thursday, August 4, 2016 - 7:49am  
Submitted values are:

Name: Lane Cobb  
Organization/Affiliation: Self  
Address: 11021 NW Skyline  
City/State/Zip: Portland/Oregon/97231  
E-mail address: [lanesscobb@yahoo.com](mailto:lanesscobb@yahoo.com)

Comments: The west slope views in question make NO sense because there are no public viewpoints of the west side of the west slope within Multnomah county. The slopes cannot be seen or appreciated from I-26 as suggested by the council. the community was not informed that this would be discussed at the April community meeting at the comprehensive plan. A public forum has not been scheduled for residents to voice their concerns before the plan is presented on August 25th.

The results of this submission may be viewed at:  
<https://multco.us/node/28556/submission/61044>

[Quoted text hidden]



Rithy KHUT <rithy.khut@multco.us>

## [Comprehensive Plan] Form submission from: Comprehensive Plan and Transportation System Plan - Board of County Commissioners Comment Form

Multnomah County <webmaster@multco.us>  
To: compplan@multco.us

Thu, Aug 4, 2016 at 8:33 AM

Submitted on Thursday, August 4, 2016 - 8:33am  
Submitted values are:

Name: Herb Doumitt  
Organization/Affiliation: Self  
Address: 6808 NW Skyling Blvd.  
City/State/Zip: Portland, Oregon 97229  
E-mail address: [hdoumitt@spiritone.com](mailto:hdoumitt@spiritone.com)  
Comments:  
Multnomah County Board of Commissioners

I am writing in regards to a proposed environmental overlay being applied to the land west of the West Hills.

The problem with this well intentioned proposal is that it will have very negative consequences. Adding more, unnecessary regulations to our living conditions will further decrease our quality of living.

Housing costs in the county are sky high. Limited property supply and rising costs of construction have driven costs through the roof. Fixed income couples like me and my wife can barely afford our property taxes. We built our empty nester house with the intention of retiring and enjoying the bounty of the Northwest. The costs of living, driving and medical care have seriously altered our retirement. This proposal has the expected outcome of raising our property taxes further. This proposal will exasperate the already serious housing crisis in the county.

The first question I ask you to ask the Planning Department of their proposal is "What problem are you trying to solve?" Without the proper public process being followed, we did not have an opportunity to comment on this draconian proposal. There wasn't any public involvement at all. None! This is not the kind of transparency we expect of our elected Commission.

Do the right thing. Make living in Multnomah County more affordable, not less. Reject this environmental overlay proposal.

Besides, if the intent is to improve the view in the western area, then take this simple, inexpensive step: Install DO NOT LITTER signs on Cornell, Thompson, Springville, Germantown and West Union roads.

The results of this submission may be viewed at:  
<https://multco.us/node/28556/submission/61047>

[Quoted text hidden]



Rithy KHUT <rithy.khut@multco.us>

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## [Comprehensive Plan] Form submission from: Comprehensive Plan and Transportation System Plan - Board of County Commissioners Comment Form

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**Multnomah County** <webmaster@multco.us>  
To: compplan@multco.us

Thu, Aug 4, 2016 at 9:09 AM

Submitted on Thursday, August 4, 2016 - 9:09am  
Submitted values are:

Name: Jim  
Organization/Affiliation: Pickett  
Address: 10933 NW Skyline Blvd.  
City/State/Zip: Portland  
E-mail address: [jim.m.pickett@gmail.com](mailto:jim.m.pickett@gmail.com)

Comments: It is 8/4/2016 and I just learned of the board considering the SEC-v expansion from a concerned neighbor who also was made aware from a realtor friend. It feels like the Multnomah County Board of Commissioners was surreptitious in their discussion of this expansion in their 4/11/2016 meeting. Without my, or my neighbor's ability and opportunity to discuss this issue openly with the Board prior to consideration, I am in complete opposition to this expansion.

The results of this submission may be viewed at:  
<https://multco.us/node/28556/submission/61049>  
[Quoted text hidden]



Kevin COOK <kevin.c.cook@multco.us>

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## Fwd: Multnomah County View Overlay West Hills Area

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land.use.planning land.use.planning <land.use.planning@multco.us>  
To: Kevin COOK <kevin.c.cook@multco.us>

Fri, Aug 5, 2016 at 8:12 AM

Thank you for responding to Robert. :)

----- Forwarded message -----

From: **Robert Rankin** <robertr35@comcast.net>  
Date: Thu, Aug 4, 2016 at 5:45 PM  
Subject: Multnomah County View Overlay West Hills Area  
To: "land.use.planning@multco.us" <land.use.planning@multco.us>

A neighbor advises that Multnomah County is considering imposing a Overlay for Views to the West Hills area which includes my property.

I have not previously heard that such a proposal (primarily for Washington County home owners) was under consideration.

I am concerned that the restrictions described to me would have a significant impact on my property and unnecessarily add to the tangled skein of regulations already laid down. If I cannot develop my property for 50 years why impose significant limits on my present enjoyment?

I request that this overlay be delayed until there is time for public input and consideration.

Robert Rankin



Rithy KHUT <rithy.khut@multco.us>

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## [Comprehensive Plan] Form submission from: Comprehensive Plan and Transportation System Plan - Board of County Commissioners Comment Form

1 message

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**Multnomah County** <webmaster@multco.us>  
To: compplan@multco.us

Thu, Aug 4, 2016 at 9:53 PM

Submitted on Thursday, August 4, 2016 - 9:53pm  
Submitted values are:

Name: EDWIN D. VONDE VELD  
Organization/Affiliation:  
Address: PO BOX 514  
City/State/Zip: PENN VALLEY, CA 95946  
E-mail address: [jodyvv@yahoo.com](mailto:jodyvv@yahoo.com)  
Comments:

My wife and I own 4.66 acres on NW Beck Road, Multnomah County identified as R325786 and R325789. We are concerned that the proposed Multnomah Comprehensive Plan may negatively impact the development of our property with a single family dwelling.

The Plan shows the property entirely within a greater than 25% slope zone and within a historical landslide area. The slope is much steeper than that as it drops into the creek, but there is approximately 1/2 acre above and beyond the Significant Environmental Concern (SEC) zone required setbacks from the creek, which ranges from 5% to 20% slope. An aerial photo of our NW Beck Road property shows no indication of landslides within the last 30 years at least. We feel it is wrong to unnecessarily encumber property owners with additional requirements based on conditions which may not accurately represent a particular piece of property.

We recognize the need to protect wildlife habitat and streams, but feel the existing SEC Zones with their potential for multiple overlays, adequately safeguard the environment and foster safety in the rural environment in which we choose to live.

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The results of this submission may be viewed at:  
<https://multco.us/node/28556/submission/61086>

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## Metro | *Making a great place*

August 4, 2016

Board of County Commissioners  
Multnomah County  
c/o Land Use Planning Division  
1600 SE 190<sup>th</sup> Avenue  
Portland, Oregon 97233

**RE: METRO COMMENTS – Draft Comprehensive Plan Updates**

Dear Chair Kafoury and County Commissioners:

On behalf of Metro, I want to thank you for the opportunity to participate in this Comprehensive Plan Amendment process. Through this letter, I hope to share a bit more background on Metro's Parks and Nature Program; provide general comments and concerns on the proposed Comprehensive Plan amendments; and propose plan language amendments for your consideration. Metro seeks edits that support Metro's role as a park service provider and to balance recreational needs and uses with natural resource protection and neighborhood concerns. I would also like to thank Planning Director Michael Cerbone and Multnomah County staff for their work on this complex project.

**The Comprehensive Plan Amendment Process:**

The County's Comprehensive Plan update process is largely a citizen-driven process, with the Citizen Advisory Committee (CAC) submitting its recommendations to the County Planning Commission for consideration and discussion. The Planning Commission was the first county government body to review the draft plan and thereafter provide policy guidance to the Board of County Commissioners.

Before the Planning Commission, Metro presented comments and concerns, as well as proposed revisions to the County's draft comprehensive plan language. The Planning Commission heard testimony that supported Metro's positions. The Planning Commission also heard testimony that sought to isolate the County's rural lands and residents. Additional testimony was received that requested that the commissioners downplay Metro's role as a natural area and parks provider and to support language that, in Metro's respectful opinion, would:

- Incorrectly describe Metro;
- Misstate Metro's actual policies regarding land management and program objectives;

- Regulate recreational uses on resource lands more stringently than other forms of development; and
- Thereby frustrate and burden Metro's ability to serve a diverse and growing population of County residents and their needs within Metro's parks and natural areas program.

Through amendments and clarifications to the draft plan, the Planning Commission addressed some of Metro's concerns, while leaving others for the Board of County Commissioners to consider.

Metro's remaining primary concerns are inaccurate statements and descriptions of Metro and our Bond program, and language that appears to regulate public recreational uses more stringently than other permitted and conditional uses on resource lands. Metro requests that the County Commission adopt the amendment language proposed below. In adopting this language, Metro is seeking to have the proposed comprehensive plan language be consistent with the language found elsewhere in the County's zoning code so as to promote efficient and effective application and implementation.

**Metro's role as a park, recreation, and natural resource provider:**

Metro, as a park service provider, has its roots in Multnomah County and the County's park system. In 1995, Multnomah County transferred ownership, responsibility and staff for its parks, cemeteries and boating and recreation facilities to Metro. Metro is now the de-facto park service provider for county residents, owning and managing approximately 8,500 acres in Multnomah County. As provided for in Metro's 2016 Parks and Nature System Plan, Metro's Parks and Nature mission is to protect water quality, fish and wildlife habitat, and create opportunities to enjoy nature close to home through a connected system of parks, trails, and natural areas.

With the passage of two regional bond measures in 1995 and 2006, Metro began a natural areas acquisition program that vastly expanded publicly owned natural lands in Multnomah County. The operations levy, passed by regional voters in 2013, made it possible for Metro to begin restoring and promoting the health of local ecosystems, and to provide access for county residents of all ages and abilities to learn and enjoy them. As the greater Portland area grows and becomes more diverse, the County, Metro and partners see a shared opportunity to make parks and nature relevant to the communities they serve.

Metro owns, operates and manages well loved parks and open spaces in the County, including Oxbow and Blue Lake Regional Parks, Sauvie Island's Howell Territorial Park, and Glendoveer Golf Course and Fitness Trail. Additional Metro facilities such as the Sauvie Island Boat Ramp, Gleason Memorial Boat Ramp, Broughton Beach and Chinook Marine Facility provide close-in access to the Columbia River for County residents. Numerous

natural areas throughout the county provide more passive recreational opportunities, in addition to providing important water quality and wildlife habitat benefits. Metro's facilities provide a diverse range of outdoor recreational opportunities and experiences, including boating, hiking, bicycling, bird watching, and general scenic and recreational access.

Metro parks in Multnomah County serve approximately 1 million visitors a year. In 2016, Metro Park's youth educational programs served nearly 9,000 children, with over 6,000 children served at Smith and Bybee, Oxbow, and Blue Lake alone.

**Consistent/Compatible word choice issue:**

With this background in mind, Metro's objective with the Comprehensive Plan amendments is to have recreational uses regulated on an even playing field with other permitted uses, in a manner that balances recreational uses with wildlife and resource objectives, which is compatible with resource concerns, and does not cause significant impacts. Of note, this is how other uses (such as dwellings) are discussed in the draft Comprehensive Plan and regulated in the County's resource land zoning code.

In hearings before the Planning Commission, much of the discussion centered on the use of words which may regulate recreational uses more stringently than other permitted uses, and that were ambiguous and inconsistent with the County's zoning code. This issue is reflected in Metro's proposed amendment nos. 5-7 discussed below, as well as in response to comments received to date, also discussed below. Metro suggested that "compatibility" was a better, more commonly understood, and more appropriate standard to apply when reviewing the potential impacts of recreational uses on natural resources and the surroundings.

After a public review of all the dictionary definitions of "consistent," the Planning Commission chose to use the word "consistent" with the understanding that it meant or was otherwise synonymous with "compatible." Additionally, for consistency and clarity, the Planning Commission recommended that "consistent" be used repeatedly as the standard, replacing other words such as "harmonious" and "complementary," which they found to be ambiguous after hearing Metro's concerns.

Metro respectfully requests that the Board of County Commissioners, at a minimum, adopt the reasoning of the Planning Commission and find that "consistent," as used in the plan, is synonymous with "compatible."

However, it is our opinion that "compatible" is a better word choice for a land use standard, as is represented in other sections of the draft Comprehensive Plan and in the County zoning code. In our revisions offered below, we have proposed the term "compatible."

For example, in draft plan Chapter 4, Forest Land, and the discussion of dwellings, policy 4.11 states: "Allow no dwellings, or other uses which are **incompatible** with commercial forestry...." 4.14 states that new dwellings are only allowed when "they will have no **significant impact** upon forestry practices, open spaces, public facility, wildlife habitat, and rural community character." In the land use profession, compatibility and significant impact tests are normal and easily applied standards, with developed judicial guidance on how to do so.

As an additional example, County Zoning Code Chapter 33 (West Hills Rural Plan Area) demonstrates that "compatibility" is the standard used when reviewing a proposed use to its surrounding (for example, is the use proposed compatible with wildlife habitat), while "consistent" is used when addressing a specific standard (for example, is the use proposed consistent with § 33.2030). In fact, nowhere in the County code regulating resource areas are the words "consistent" used when reviewing a use to its surroundings, and nowhere is "complementary" or "undue impacts" used.

By comparison, the draft Comprehensive Plan language requires that recreational uses be "consistent" with wildlife and area uses and not cause "undue impacts." Respectfully, these standards are not good fits. In Metro's opinion, the draft language may create ambiguity in application and can be improved by using the word "compatible."

#### **PROPOSED DRAFT PLAN REVISIONS:**

In Metro's opinion, the three most critical elements of a comprehensive planning update process are diverse citizen involvement, partnering public agency coordination, and transparency. The plan should reflect the interests, goals and strategies that meet the needs of all County residents. The process also attempts to ensure the compatibility of County planning programs with those of other jurisdictions and agencies. Coordination with other governmental agencies and refining the plan are essential to achieve this end.

The Statewide Planning Goals are Oregon's mandatory standards for comprehensive planning. With respect to the County's natural resources and open space/recreational policies, Statewide Planning Goal 8 calls for the County to evaluate its recreational areas and facilities and develop plans to deal with the projected demand for new recreational opportunities. Similarly, Statewide Planning Goal 5 directs the County to protect natural resources and conserve open spaces, which includes land for recreational uses. In Goal 5 we see the carrying capacity of the natural resources as a planning consideration.

Throughout the planning and policy directives in these Statewide Goals are the requirements of ensuring adequate recreational opportunities for a diverse and growing public with different abilities, to conserve energy by providing opportunities close to urban centers, and highlighting the importance of properties and areas that can meet multiple

needs and objectives and within the carrying capacity of the land. All of those policy objectives pertain to Metro, its lands, and its role as a County natural area, park and recreation service provider.

Metro respectfully requests the following proposed revisions to the June 2016 Draft Comprehensive Plan. This document focuses solely on the Introduction and Citizen Involvement (Chapter 1); Natural Areas (Chapter 5); and Parks and Recreation (Chapter 8).

Revisions are shown with strikethrough/underline text to denote ~~deleted~~ and new text. The recommendations are intended to clarify and correctly represent Metro's role as a service provider; improve and clarify policy language; and eliminate conflicts between other County policies and land use standards. For each revision, Metro offers an explanation for the requested amendment.

**#1: Chapter 1 - Introduction and Citizen Involvement:**

**At page 1-31: Discussing the characteristics of the West Hills**

**"Public lands:** Metro owns over 1,000 acres near the northern end of Forest Park ~~to ensure wildlife connectivity. Metro is actively restoring this former timber land to a diverse native habitat to protect water quality, promote fish and wildlife habitat, and create opportunities for county residents to enjoy nature.~~ These Metro properties are part of a large and extensive network of protected natural and recreational areas in the West Hills that extend into the city of Portland's jurisdiction, including Forest Park Conservancy's Ancient Forest Preserve, over 5000 acres in Portland's Forest Park and the Audubon Society of Portland's 150-acre Nature Sanctuary, Washington Park, and the Hoyt Arboretum. The Bureau of Land Management owns land north of Cornelius Pass Road used for forestry and recreation. Nearby Burlington Bottoms is part of this network of public land, providing high value breeding ponds for amphibians that migrate to and from our upland forests."

**Explanation:** The proposed amendments seek to accurately state the existing condition of the land and the reasons why Metro owns it. Metro requests the phrase "ensure wildlife connectivity" be deleted and replaced with a correct statement of why Metro holds over 1,000 acres north of Forest Park. The land is not held specifically and only to ensure wildlife connectivity as represented in the draft. Rather, the land is held to promote Metro's park and nature department mission that has three elements: "to protect water quality, fish and wildlife habitat, and create opportunities to enjoy nature close to home through a connected system of parks, trails, and natural areas." Metro's park mission and vision statement are found in the 2016 Parks and Nature System Plan.

During the Planning Commission hearings, County Counsel stated that any representation in the Comprehensive Plan about Metro, including why land is held

and what Metro intends, should be truthful and verifiable in a public document, such as a planning document. The draft plan language currently includes statements about Metro and its West Hills holdings that are not accurate.

Additionally, the public lands located in the Tualatin Mountains include a large and extensive network of interconnected trails, providing access to nature for all County residents. As drafted, there is no mention of the recreational element and the role that public lands play in providing parks and recreational opportunities to County citizens. Metro is of the opinion that this community service should be recognized. As such, Metro requests including "and recreational" areas in describing the West Hills.

**#2 Chapter 5 - Natural Resources:**

**At page 5-28: Fish and Wildlife Habitat**

5.27 "Protect significant native fish and wildlife habitat and wildlife corridors and specifically limit conflicting uses within natural ecosystems and sensitive big game winter habitat areas."

**Explanation:** Metro does not understand what the phrase "within natural ecosystems" in the context of limiting conflicting uses within natural ecosystems means. It seems to be a very broad term and could present problems for both the County and landowners in trying to implement it.

**#3 Chapter 8 - Parks and Recreation:**

**At page 8-3: Discussing agencies/recreational service providers**

"Metro. Metro is a regional government agency serving Multnomah County residents and the greater Portland area. Metro, as a parks service provider, and as an owner and operator of open space generally, has its roots in Multnomah County and the County's park system.

In 1995, Metro assumed ownership and operation of a number of park and recreational facilities previously owned and operated by the County, including Oxbow Regional Park, Blue Lake Regional Park, Glendoveer Golf Course and Fitness Trail, Howell Territorial Park, Gleason Memorial Boat Ramp, Broughton Beach, Chinook Marine Facility, historic cemeteries, and a number of other facilities. Metro also owns and manages a number of natural areas and nature preserves in Multnomah County to protect water quality, promote fish and wildlife habitat, and provide citizen access to nature.

With the passage of two regional bond measures in 1995 and 2006, Metro began a natural areas acquisition program that vastly expanded publicly owned natural lands in Multnomah County. The operations levy, passed by regional voters in 2013, made it possible for Metro to begin restoring and promoting the health of local ecosystems, and to provide access for county residents of all ages and abilities to learn and enjoy them.

Metro's facilities provide a diverse range of outdoor recreational opportunities and experiences, including boating, hiking, bicycling, bird watching, and general scenic and recreational access.

Today, Metro's Parks and Nature mission is to protect water quality, promote fish and wildlife habitat, and create opportunities to enjoy nature close to home through a connected system of parks, trails, and natural areas."

**Explanation:** This section is intended to introduce the public agencies (State of Oregon, Metro, BLM, etc.) that provide parks and recreation services to Multnomah County residents. Respectfully, the description provided in the draft document does not completely describe Metro, its history with Multnomah County, and the degree to which it is park service provider for County residents. Metro is of the opinion that it is important to reflect Metro's role, its park and recreational assets in the County, and its management objectives. As such, Metro proposes language that provides some historical perspective of Metro's role as a park service provider and more accurately reflects the agency and its public mission.

#### **#4 At page 8-9: "Goals, Policies, and Strategies"**

**"Goal:** To help meet the recreational needs of Multnomah County ~~rural~~ residents and visitors to its rural areas through support of, and coordination with local, regional, state, and federal agencies that manage recreation facilities and sites within the County."

**Explanation:** Metro is uncertain why the County's Comprehensive Plan, and specifically the Goal of the Parks and Recreation chapter, is described as only intended to meet the recreational needs of the county's *rural* residents. Metro understands Multnomah County and its Comprehensive Plan to represent and govern all County residents, and not just rural residents.

The Plan at page 1-18 details County-wide demographics, with county population increasing dramatically. The data indicates that rural areas are characterized by significantly less racial/ethnic diversity and higher median household incomes, with the West Hills having a significantly higher median household income.

Limiting the Goal of the County's recreational policies to rural residents may conflict with other elements of the draft Comprehensive Plan, and specifically Chapter 1

Equity goals and policies. There, the intent of the plan is “to incorporate and embody the County’s commitment to racial/ethnic equity and empowerment.” Its Goal is: “To support access to all people and to ensure that planning policies and programs are inclusive.” Plan at page 1-36.

**#5 At page 8-9: “Parks and Recreation Planning”**

8.2 “Encourage the development of recreation opportunities by public agencies and private entities ~~consistent~~ compatible with wildlife habitat and wildlife corridor protection.”

**Explanation:** Metro is of the opinion that “consistent” is not an appropriate word/connecting element in the policy statement. “Consistent” means happening in the same way. Recreation opportunities cannot “happen in the same way” as wildlife habitat and wildlife corridor protection. Using the adjective “consistent” in the draft policy will create implementation problems which can be avoided by using the correct adjective in its place. Metro believes it is more appropriate that recreational opportunities be “compatible” with wildlife habitat. “Compatible” is an understandable and common adjective to describe the relationship between a use and its impact on wildlife habitat.

**#6 At page 8-10: “West Hills Policies and Strategies”**

8.8 “Support only those recreational activities within the West Hills area that are ~~consistent~~ compatible with and do not cause ~~undue negative~~ significant impacts on natural and environmental resources that are identified in Goal 5.”

**Explanation:** The first amendment request is similar to the issue in section 8.2 above.

Regarding the second amendment, without further clarification of what “undue negative impacts” constitutes, Metro is concerned the phrase may result in an overly restrictive standard. As commonly understood and according to Webster’s “undue” means: “1: not due; not yet payable 2: exceeding or violating proprietary or fitness.” Metro does not believe that “undue” is an appropriate land use planning regulatory term. Instead, Metro recommends the “significant impact” test be used here, as it is elsewhere in the draft plan and throughout the County’s zoning code.

**#7 At page 8-10: "Sauvie Island and Multnomah Channel Policies and Strategies"**

8.9.1. "Ensure activities will be ~~consistent~~ compatible with natural and environmental resources of local and regional significance; and"

8.9.2. "Ensure that Howell Territorial Park uses and improvements are ~~consistent~~ compatible with the rural character of the plan area as well as natural and cultural resources."

8.10 "Support only those recreational activities within the SIMC area that are ~~consistent~~ compatible with and ~~do not negatively impact~~ do not significantly impact natural and environmental resources on Sauvie Island and along the Multnomah Channel and its tributaries that are identified in Goal 5."

**Explanation:** The edits here are intended to promote consistency: to make the language in the West Hills policies and strategies above, which seek the same policy objectives, consistent with the Sauvie Island policies and strategies.

**Response to Comments Received to Date:**

To date, the County has received a number of public comments. Metro respectfully offers the following responses to four specific comments.

The first comment proposes that the word "consistent" be replaced with "complementary" throughout the plan as the standard by which a new Metro park needing a plan amendment would be reviewed. We object to this proposal. As stated above, and for purposes of clarity and confirming legislative intent, the Planning Commission chose to use the word "consistent" with the understanding that it meant or was otherwise synonymous with "compatible." The public comment request is for that effort to be undone.

Although "complementary" is used in the SIMC rural area plan, Metro is of the opinion that word is not appropriate for a land use planning standard. The use of an ambiguous and inappropriate word standard should not be repeated, particularly given the importance of the task the County is performing.

As commonly understood and according to Webster's: "Complementary" means: "1: relating to or constituting one of a pair of contrasting colors that produce a neutral color when combined in suitable proportions 2: serving to fill out or complete 3: mutually supplying each other's lack 4: being complements of each other. "Complement" means: 1a: something that fills up, completes or makes perfect b: the quantity or number required to make a thing complete c: one of two mutually completing parts. Metro does not understand how a park use, and trails generally, could be found to make the forest land perfect. Respectfully, the word "complementary" is an unworkable standard.

The comment also references the need to include the word "undue" as in "do not cause undue negative impacts" as a standard. As commonly understood and according to Webster's, "undue" means: "1: not due; not yet payable 2: exceeding or violating proprietary or fitness." This also appears to be an unworkable standard.

The commenter offers their own definitions of "complementary" and "undue" that do not exist in dictionary resources. Metro is of the opinion that creating definitions that are not commonly understood should not be encouraged as it will bring uncertainty, ambiguity, and conflict into administration of the County's Comprehensive Plan.

The second specific comment requests clarification of the relationship between the subarea and countywide policies, stating that the county's draft plan does not do so. Metro respectfully disagrees with the request. The plan already includes language describing the relationship between the plan's goals, policies, and strategies. That is found in the plan's introduction section at pages 1-6, which also highlights the traditional and expected balancing process that occurs when reviewing any proposal for compliance with a comprehensive plan. The offered language would upset that balancing process.

The third comment seeks to impose additional regulations on public park uses and to further regulate them more stringently than any other use permitted in the resource zone. There is already a requirement to balance recreational facilities with environmental concerns. However, the request would create a higher bar for any recreational facility proposed on rural lands by including restrictive and ambiguous language that we believe may be difficult to meet. For example, it is proposed that only "passive recreational and educational use without degrading natural resource is acceptable" and that any resource conflicts must be resolved in favor of no recreational uses.

As commonly understood and defined by Webster's, "degrade" means: "1a: to lower in grade, rank, or status 2: To bring to low esteem or into disrespect 3: to impair in respect to some physical property." Again, words such as "degrade" or "degrading" are not traditional or appropriate standards.

Assuming the third definition of degrade may be applicable, the word "impair" is itself ambiguous – from simply something that damages at one degree to something that is only a material damage to another degree. Again, Metro is of the opinion that using words that are not commonly and traditionally used in land use planning would create hurdles for public park uses that may be impossible to overcome and may forever prevent new parks from serving County residents.

The fourth comment reiterates the request to replace the planning commission's use of the word "consistent" with "complementary." See Metro's response to first comment above. The comment also seeks to have Metro removed from Chapter 8 policy 8.1, which in

Board of County Commissioners  
August 4, 2016  
Page 11

its draft form correctly represents Metro's role in promoting an interconnected regional network of parks, trails, and natural areas. Metro requests that its reference not be removed from policy 8.1.

Metro thanks you for the opportunity to address these matters and appreciates your considerations.

Respectfully,

A handwritten signature in black ink, appearing to read "Kathleen Brennan Hunter". The signature is fluid and cursive, with a large, stylized initial "K" and a long, sweeping underline.

Kathleen Brennan Hunter, Director  
Parks and Nature Department



Rithy KHUT <rithy.khut@multco.us>

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## [Comprehensive Plan] Form submission from: Comprehensive Plan and Transportation System Plan - Board of County Commissioners Comment Form

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Multnomah County <webmaster@multco.us>  
To: compplan@multco.us

Fri, Aug 5, 2016 at 12:37 PM

Submitted on Friday, August 5, 2016 - 12:37pm  
Submitted values are:

Name: Mark Tesauro  
Organization/Affiliation: Landowner / small farmer in West Hills area  
Address: 15245 NW Cornelius Pass Rd  
City/State/Zip: Portland, OR 97231  
E-mail address: [mark.tesauro@qorvo.com](mailto:mark.tesauro@qorvo.com)  
Comments:

I attended all the presentations and discussion at the Skyline School meeting on this plan and am reasonably well informed as to its contents.

While there are many reasonable aspects to the proposal and some apparent improvements, I find the proposed SEC-v overlay extension to the west side of the West Hills particularly objectionable. It is an unjustifiable taking of private property rights and could be interpreted as primarily a means of increasing property tax revenues. The primary beneficiaries would be persons in Washington County, with the costs resting on Multnomah County property owners. I do not believe this proposal enhances the community enough to justify its imposition and strongly urge that it be discarded.

The results of this submission may be viewed at:  
<https://multco.us/node/28556/submission/61110>

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You received this message because you are subscribed to the Google Groups "Comprehensive Plan Update" group.  
To unsubscribe from this group and stop receiving emails from it, send an email to [compplan+unsubscribe@multco.us](mailto:compplan+unsubscribe@multco.us).



Rithy KHUT <rithy.khut@multco.us>

## [Comprehensive Plan] Form submission from: Comprehensive Plan and Transportation System Plan - Board of County Commissioners Comment Form

Multnomah County <webmaster@multco.us>  
To: compplan@multco.us

Fri, Aug 5, 2016 at 2:13 PM

Submitted on Friday, August 5, 2016 - 2:13pm  
Submitted values are:

Name: Dave Hunnicutt  
Organization/Affiliation: Oregonians In Action  
Address: 11735 SW Queen Elizabeth St.  
City/State/Zip: King City, OR 97227  
E-mail address: [dave@oia.org](mailto:dave@oia.org)  
Comments:  
Commissioners:

Oregonians In Action (OIA) has two concerns with the proposed Comprehensive Plan update. First, it appears that the County is attempting to re-adopt the rural reserves which the County has originally adopted in 2010, but which were invalidated by the Oregon Court of Appeals in 2014. The proposed Comp Plan update includes a map of the County's rural reserves as Figure 1-3. This appears to be a map of the 2010 reserves. In Policy 2.4(1) (pg. 2-10), the Comp Plan states:

"Areas shown as rural reserve on the County plan and zone map shall be designated and maintained as rural reserves to protect agricultural land, forest land, and important landscape features."

Although we recognize that the County has authority to designate rural reserves, your authority is limited by statute, LCDC administrative rule, and the intergovernmental agreement which the County signed with Metro in March, 2010. In addition, the County has yet to follow the requirements set out by the Court of Appeals and LCDC on remand. Unless and until the County complies with the state requirements, the remand requirements, and its obligations under the IGA with Metro, the County cannot designate rural reserves, and your efforts to do so in this proposed Comp Plan amendment must fail.

One way to remedy this situation would be to simply remove the map included as Figure 1-3 from the proposed amendments. If at some point the County is able to follow through with its procedural obligations and amend the Comp Plan to designate rural reserves, there is nothing wrong with the language set out in Policy 2.4(1). But you cannot adopt reserves maps at this time.

The second concern we have is with Policy 5.47. There is no need for the County to include language in the Comprehensive Plan that requires it to "consider" expansion of the SEC-v overlay zone to the west slope of the West Hills area. If the County wants to amend its Goal 5 scenic views inventory, you are certainly free to do so, provided you comply with all the procedural requirements for a post-acknowledgment plan amendment, and are willing to process and litigate all of the Measure 49 claims that will follow from property owners who are now limited in the use and enjoyment of their homes as a result of the many new requirements that follow from inclusion of their property in the scenic view overlay zone. However, it is of no use to adopt a policy that requires the County to consider Goal 5 amendments. If the Board decides to do so at some point in the future, you are free to do so - you don't need language in your Comp Plan that requires you to do so, particularly since the language is not specific enough to bind you to any type of process or any level of review should you undertake the task. Why clutter the Comp Plan with unnecessary policies?

Please enter these comments in the record.

Dave Hunnicutt  
President  
Oregonians In Action

The results of this submission may be viewed at:

<https://multco.us/node/28556/submission/61116>

[Quoted text hidden]



Rithy KHUT <rithy.khut@multco.us>

**Fwd: METRO COMMENTS - Draft Comprehensive Plan Updates**

Rich FAITH <rich.fait@multco.us>  
To: Rithy Khut <rithy.khut@multco.us>

Fri, Aug 12, 2016 at 2:05 PM

----- Forwarded message -----

From: April Gutierrez <april@pnwtax.com>  
Date: Thu, Aug 11, 2016 at 5:42 PM  
Subject: METRO COMMENTS - Draft Comprehensive Plan Updates  
To: [mult.chair@multco.us](mailto:mult.chair@multco.us), [district1@multco.us](mailto:district1@multco.us), [district2@multco.us](mailto:district2@multco.us), [district4@multco.us](mailto:district4@multco.us), District 3 <[district3@multco.us](mailto:district3@multco.us)>  
Cc: Dan Moeller <[Dan.Moeller@oregonmetro.gov](mailto:Dan.Moeller@oregonmetro.gov)>, Kena Ramsey <[ramsey@rammedia.net](mailto:ramsey@rammedia.net)>, Tim Lagasse <[tim.lagasse@emi-worldwide.com](mailto:tim.lagasse@emi-worldwide.com)>, Marty DeVall <[oet@pacssi.com](mailto:oet@pacssi.com)>, Bethel Webber <[bethwebber@earthlink.net](mailto:bethwebber@earthlink.net)>

Dear Chair Kafoury and County Commissioners:

Today I received a copy of the Draft Comprehensive Plan Updates and wanted to provide feedback.

I believe the proposed changes are well thought out and described. Since the purpose of the changes is to reduce confusion and also to clarify that Metro's Parks and Nature mission specifically includes equitable opportunities to enjoy nature, I respectfully request that the following sentence as shown on Page 7 of Director Kathleen Hunter's recommended changes to the the Draft Comprehensive Plan be edited as follows: "Metro's facilities provide a diverse range of outdoor recreational opportunities and experiences including boating, hiking, bicycling, horse-back riding, bird watching, and general scenic and recreational access.

As a member of equestrian trail-riding community, I place the highest value on continued and expanded access to our parks for equestrian use and feel it is important that this frequently overlooked group of outdoor enthusiasts is given equitable mention in official documents; particularly those describing access to nature areas.

Thank you for your thoughtful consideration of this matter.

Sincerely,

--

**April Gutierrez, E.A., L.T.C**  
**Managing Director**

**Pacific Northwest Tax Service [www.pnwtax.com](http://www.pnwtax.com)**

**13405 NW Cornell Rd, Portland, OR 97229**  
**Cell: 503-341-2376    Office: 503-646-5600**

Any advice contained in this email is based upon the facts and information you have given me. If you have additional facts or information my opinion may change.

If you have received this message by mistake, please notify us immediately by replying to this message or telephoning us. Thank you.



Rithy KHUT <rithy.khut@multco.us>

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## Fwd: Draft Comprehensive Plan Update

1 message

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----- Forwarded message -----

From: Bethel Webber <[bethwebber@earthlink.net](mailto:bethwebber@earthlink.net)>

Date: Fri, Aug 12, 2016 at 12:24 PM

Subject: Draft Comprehensive Plan Update

To: [mult.chair@multco.us](mailto:mult.chair@multco.us), [district1@multco.us](mailto:district1@multco.us), [district2@multco.us](mailto:district2@multco.us), [district3@multco.us](mailto:district3@multco.us), [district4@multco.us](mailto:district4@multco.us)

Dear Chair Kafoury and County Commissioners:

I have been reviewing a copy of the Draft Comprehensive Plan Update. There is much in this plan to agree with.

I have given my citizen input to Metro's Parks and Nature planning meetings, followed the process by attending community and Metro meetings and believe they have worked to balance different community needs.

As a member of equestrian trail riding, a dispersed but very avid group, I urge you to include in the Comprehensive Plan Update horseback riding where phrases are included explaining the range of outdoor recreational opportunities. We continue to use and would like to see expansion of riding opportunities in our parks. This in addition will continue to encourage the inclusiveness of all in our parks.

Thank you for your consideration.

Sincerely,

Beth Webber



Rithy KHUT <rithy.khut@multco.us>

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**[compplan.mailings] Multnomah County Comp Plan & Transportation System Plan - Board of County Commissioners Briefing**

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Judy Keppler <judynronk@gmail.com>  
To: compplan@multco.us

Fri, Aug 12, 2016 at 6:23 PM

SEC-V Designation To Comprehensive Plan

Paul and Judy Keppler  
11611 NW Plainview Road  
Portland OR 97231

My husband and I are very concerned about the rezoning in your proposal. We found out about this from a letter which was mailed to us from a realtor. A significant raise in taxes affects us. We are retired, hoping to live in our home a few more years and not be forced out by this outrageous tax increase proposal based on the view. We have no view overlooking the city nor do we have city utilities or a county road that is maintained. This proposal is out of the blue and out of line (in our opinion). The lack of transparency and lack of concern for the citizens whom this proposal hurts is unbelievable.

I was too late to write a letter of complaint but hope to attend the upcoming meeting to protest. We agree with the president of Oregonians in Action. This is wrong!

Judy Keppler

Sent from my iPhone



Rithy KHUT &lt;rithy.khut@multco.us&gt;

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**Fwd: Comprehensive Plan Updates**

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Rich FAITH <rich.faith@multco.us>  
To: Rithy Khut <rithy.khut@multco.us>

Mon, Aug 15, 2016 at 11:34 AM

Dear Chair and Commissioners,

My name is Ron Strasser. I live in the University Park Neighborhood in North Portland. I hope you can take the time to read through my comments.

I grew up quite poor in the eastern Oregon town of Nyssa. In this day and age, the breaks my alcoholic parents got back in the 50s-60s from landlords would not take place and we would probably be homeless. But that was then. At any rate it is part of my perspective on things in life like Comprehensive Plan Updates.

Metro has taken on the tough task of taking care of our green spaces and parks at a time when increasing population demands on our metro area are enormous. Their science and work with other governmental agencies is extensive and well thought through. They understand that it is a crucial part of our future to allow non motorized human access to parks as well as protect the flora and fauna. As a long time member of very important organizations like "The Nature Conservancy", "National Wildlife Federation" and "1000 Friends of Oregon" I understand the importance of our wild areas, farmlands and waterways. Protecting these things are key to our survival. I am also a member of "The Bicycle Transportation Alliance" and "Northwest Trail Alliance" that are very important voices for human powered transportation as well as promotion of healthy lifestyles, and support for our beautiful natural areas where we love to spend time. I managed to get through my (tough row) of a childhood and then had somewhat of a miracle my senior year of high school. It was spring of 1967. I had zero plans for my future other than to graduate in June. The one councilor in my school sent for me. I did not know if I was in trouble or what. He told me he had arranged for me to get a "work study job" at Treasure Valley Comm. Col. in Ontario. I had no idea what it meant. He explained, so I decided I would give it a go. Worked my fanny off in the fields and warehouses all summer and ended up making it trough a Bachelors Degree at Oregon State after transferring. What a gift! I could have ended up not surviving the Vietnam War. This is real. I am hear and classmates I went to school with are simply gone. They do not exist. They never had a chance. By being alive and having the "ability" (thank you steady job and retirement) and "desire" to explore(thank you teachers and mentors) what life and this beautiful earth has, is a option every person living in Multnomah County (and the planet for that matter) needs to have. All people, no matter the family income or color of their skin need to have easy access to the wonder of our close in natural areas on foot, by bike or horse. It is crucial for the health of our population. The simple fact that people getting out into nature (especially if they are getting exercise) will not only be more healthy for it, but will want to keep these places well cared for is easy to understand. Our ability in this day and age to build trails that are sustainable and have little long-lasting impact on the plants and animals is well documented. Most of the people who want to limit human access are either people who live near a green space or mistakenly think a green space within the metro area is a "wilderness area". The first reason is selfish, the second is just not a fact. The science shows that. We need to allow access to these green spaces and parks by those who cannot get into the \$40,000 SUV and drive to the beach, Mt. Hood or Bend to recreate. This is the right thing to do for the planet. We must learn to take those types of trips less frequently. It is an environmental win / win to not only take care of our green spaces here at home, but also have access for recreation in them. Way better use of energy! I urge you to adopt the language changes to the Comprehensive Plan proposed by Metro. They are common sense and are in

the best interest of not just the green spaces / parks, but the region and ever growing population. There needs to be intelligent use of these areas to protect both the wild and human life who share them!

Forgive my wordiness and I thank you very much if you read through this. I am very passionate that all the families as well as nature are treated with fairness by our elected leaders, civil servants and the many business leaders and NPOs that impact our County and Region. Your words (in this case document language) have an impact on the future of many children. Give them an opportunity many do not even know exists. Imagine what you would feel like listening to kids at school talking about a trip to the beach, an adventure on Mt. Hood biking or to Bend to ski.....when your family car is not dependable enough to leave Portland or Gresham. Yet your

cheap old bike sits at the side of the house because your parents won't let you ride it because of car danger. Give them some hope and dignity with a field of dreams for them.

Regards and thank you so much for your great efforts as community leaders.

Ron Strasser

7125 N. Newell Ave.

Portland, Oregon 97203

[503-285-6356](tel:503-285-6356)



Rithy KHUT &lt;rithy.khut@multco.us&gt;

## Fwd: Testimony regarding Metro's North Tualatin Taskforce and Access to Nature

Rich FAITH <rich.faith@multco.us>  
 To: Rithy Khut <rithy.khut@multco.us>

Tue, Aug 16, 2016 at 1:34 PM

----- Forwarded message -----

From: Jim Thayer <jim@thayers.org>  
 Date: Mon, Aug 15, 2016 at 5:58 PM  
 Subject: Testimony regarding Metro's North Tualatin Taskforce and Access to Nature  
 To: [mult.chair@multco.us](mailto:mult.chair@multco.us), [district1@multco.us](mailto:district1@multco.us), [district2@multco.us](mailto:district2@multco.us), [district3@multco.us](mailto:district3@multco.us), [district4@multco.us](mailto:district4@multco.us)

Dear County Commissioners:

As a member of the North Tualatin Taskforce convened by Metro to design the best usage for the Multnomah County land, north of Forest Park, I was both pleased by some aspects of the process and results, and also dismayed by Metro's inequitable access policies. In short this was my experience:

1. Metro's policy of excluding all pets from all their park properties is inequitable. The trails north of Newberry Rd have historically been used by residents to walk their dogs. Prior to the Metro acquisition, Hampton Hardwoods, the private owner, had expressly granted permission going back as far as the late eighties. To have a public entity use public funds to acquire land and then exclude all pet owners from trails historically accessible for dog owners was not just grossly unfair, but it was also an inequitable use of public funds. Dogs should be leashed and should be excluded from sensitive habitat, but they shouldn't be banned outright in all Metro Parks.
2. The planning process was marred by Metro's refusal to collect data that didn't serve their desired outcome. On two separate occasions I requested that baseline data be collected, but both times Metro refused to collect this important data. First, I asked that historical dog-walking activities in the area be assessed, and secondly I asked that the communities' desire for future dog walking in the area be measured. Both of these sets of data are essential for establishing an accurate baseline. In both cases, Robert Spurlock, the project manager at the time assured me that this information would be collected from the local residents that attended the outreach events. In both cases he was overruled by senior Metro staff so that neither question was asked. Even the possibility of adding comments was omitted so that the impression was created that no such user demand existed, or had ever existed. This was a clear distortion of the information gathering process.
3. At least one of the task force members dropped out of the process once they learned of these fact-finding distortions. News of this fact-finding bias, led other residents to distrust the taskforce and its recommendations.
4. The North Tualatin master plan did increase access to nature for about half of Multnomah County residents. Those that owned pets and wished to be accompanied by their pets were excluded. This exclusion, which was never adequately justified, reduced utilization significantly since pet owners are justifiably reluctant to "go for a walk" and leave Fido at home. In addition, this prohibition strikes hardest at our most vulnerable citizens, the aged who rely on a canine companion to induce them to engage in healthy exercise. The cardio-vascular benefits of walking are undisputed, especially for seniors, but this segment of the population was explicitly excluded. Lone walkers and other vulnerable individuals were also discouraged because they could not bring their canine companions for protection and/or assistance.
5. On a more positive note, the task force did show significant flexibility in meeting the residents concerns about wildlife, and cycling.
6. Metro has also agreed to review Title 10 that deals with access issues. I am hopeful that they will conduct this review in 2017 in a fair and inclusive manner.
7. I agree that the Multnomah Comp Plan should not prevent a good project from occurring, especially if it is conducted in a fair manner and supports reasonable access for all County residents .
8. The Multnomah County Comp plan should support recreational uses, especially as the density of our city increases, and an increasing number of residents take to the hills to improve their health.

Finally, Multnomah County should be aware that Weyerhaeuser has already established what amounts to a private park (2729 acres) in the region between NW Logie Trail and NW Rocky Point Road. Access can be purchased via a permit system that costs \$75 for each hiker per year and is only obtainable on-line on May 18th. This permit system is being applied across Multnomah, Columbia, Clatsop and Washington Counties and is completely out of sync with both Metro and county plans. This private park system puts more than 170,000 acres of previously accessible timberlands out of reach for Portland's residents - unless they're willing to pay \$75-\$250/year for the privilege. In effect, Portland's western forests have been put off bounds putting more pressure on our existing parks and recreational assets. For more see: [www.wycreationnw.com/Permits/PropertyPage\\_Common.aspx?PropId=11](http://www.wycreationnw.com/Permits/PropertyPage_Common.aspx?PropId=11)

Jim Thayer  
Vice Chair, Oregon Recreational Trail Advisory Committee (ORTAC)  
Member, Metro North Tualatin Taskforce  
Secretary, Columbia Land Trust Board  
Founding member, Friends of Forest Park  
Author, Portland's Forest Hikes, Timber Press, 2007  
Author, Hiking from Portland to the Coast, Oregon State University Press, 2016

Begin forwarded message:

From: Dan Moeller <[Dan.Moeller@oregonmetro.gov](mailto:Dan.Moeller@oregonmetro.gov)>

**Date:** August 11, 2016 at 11:25:13 AM PDT

**To:** Dan Moeller <[Dan.Moeller@oregonmetro.gov](mailto:Dan.Moeller@oregonmetro.gov)>

- 1.) Metro is an important park and natural area provider and manager for Multnomah County.
- 2.) Metro's North Tualatin Mountains access planning process was thoughtful, fair and inclusive.
- 3.) The North Tualatin Mountains access master plan protects and enhances natural resources and creates meaningful access to nature for kids, families and all Multnomah County residents.
- 4.) The North Tualatin Mountains access master plan was responsive to and respectful of the needs and concerns of the local community.
- 5.) The Multnomah County Comp Plan should not prevent a good project that benefits County residents, like the North Tualatin Mountains access plan, from occurring.
- 6.) Metro is asking for the fair and balanced treatment of recreational uses in the Comp Plan. Current language in the plan makes it more difficult to create meaningful access to nature than to develop other uses in the County.

Subject: Multnomah County Comprehensive Plan Update and Metro's Access to Nature Plans



Rithy KHUT &lt;rithy.khut@multco.us&gt;

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**Fwd: Draft Comprehensive Plan**

1 message

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Rich FAITH <rich.faiht@multco.us>  
To: Rithy Khut <rithy.khut@multco.us>

Thu, Aug 18, 2016 at 2:58 PM

----- Forwarded message -----

From: Kelsey Cardwell &lt;kelseyc@nw-trail.org&gt;

Date: Wed, Aug 17, 2016 at 10:51 PM

Subject: Draft Comprehensive Plan

To: [mult.chair@multco.us](mailto:mult.chair@multco.us), [district1@multco.us](mailto:district1@multco.us), [district2@multco.us](mailto:district2@multco.us), [district3@multco.us](mailto:district3@multco.us), [district4@multco.us](mailto:district4@multco.us)

August 17, 2016  
Board of County Commissioners  
Multnomah County  
c/o Land Use Planning Division  
1600 SE 190th Avenue  
Portland, Oregon 97233

Regarding the Draft Comprehensive Plan Updates

Chair Kafoury and County Commissioners:

Northwest Trail Alliance is a trail stewardship and advocacy organization for off-road cyclists. In 2015, our volunteers put in 6,000 hours maintaining and building trails.

We recently engaged with Metro on a plan for multi-use trail development at their North Tualatin Mountains properties. I was touched by how members of the project's public advisory committee challenged each other to create an inclusive plan that meets a variety of conservation and recreation goals. I testified before Metro Council in support of the final draft plan presented to the council, and many of our members testified or submitted testimony as well.

The Multnomah County Comprehensive plan should be written in a manner that celebrates—and does not inhibit—balanced community efforts to protect, preserve and enjoy our county's parks and natural spaces. Unfortunately, the current plan unfairly and unnecessarily puts at risk park development and the community-driven effort that Metro facilitated for the North Tualatin Mountains properties.

Metro has been a leader in convening diverse recreation user groups and conservation groups in our region. Their efforts to balance various community interests with natural resource protection is truly unprecedented. I recommend that the Board of County Commissioners adopt Metro's recommendations to improve the current draft plan and enable Metro to continue this important work.

Respectfully,

Kelsey Cardwell  
President  
Northwest Trail Alliance

To create, enhance, and protect mountain bike riding opportunities; to advocate for trail access; to promote responsible mountain biking; and to build, maintain, and ride sustainable trails.

Christopher H. Foster, Multnomah County Planning Commissioner  
15400 NW McNamee Rd. Portland OR. 97231

August 19<sup>th</sup>, 2016

Chair Deborah Kafoury and Multnomah County Board of Commissioners

501 SE Hawthorne Blvd, Suite 600

Portland, Oregon 97214

Re: Multnomah County Comprehensive Plan

Dear Chair Kafoury and Commissioners,

I'm writing you to let you know there is at least one Planning Commissioner that does not agree with either the Comp. Plan substantive changes our commission made on May 26, nor the more recent additional changes the Metro asks for in their August 5<sup>th</sup> letter. I am in support of the position led by Mark Greenfield and Carol Cheserek. With regard to the "complementary" language at Recreational Policy, the original language as drafted by the SIMC and Comp. Plan processes should remain.

On May 19, I wrote a brief piece to my fellow planning commission members outlining my position. That position has not changed and I find it in agreement with the Greenfield/Cheserek view. This applies to the most recent piece and new requests from Metro too. A bit of the original context may be missing here, but I think the message still comes through and is applicable today :

Christopher H. Foster, Planning Commission Member  
15400 NW McNamee Rd. Portland 97231

May 16, 2016

Re: Multnomah County Comprehensive Plan Deliberations, May 26<sup>th</sup>, 6:30 PM

Dear Chair Ingle and Fellow Planning Commission Members,

As I am unable to attend, and after checking with County Counsel, I offer a few brief comments in tonight's deliberations as though I were present. There are many aspects to consider. Here's just a few:

**Confusion About the Rural Area Comp. Plan And Statewide Goal 2 - Planning**

Current Metro Parks and certain Mt. bike club members make written comments that misunderstand the nature of our Comp. Plan process saying it is "*to represent and govern all Multnomah county residents*" and "*not just rural*", distorting our charge. I find that notion a bit like saying the City of Troutdale's Comp. Plan is for and governs all residents of Multnomah county, not just Troutdale residents. No jurisdictional perspective? Goal 2 says "*Cities and counties are expected to take into account the regional, state and national needs...*" To imply that the CACs or the county planning staff did not fulfill this expectation or not seek out Goal 2 co-ordination is baseless. I was present for those discussions. The record shows when solicited by staff, a number of agencies, land managers and owners submitted timely comment. That included a Metro letter from another department dated Feb. 3<sup>rd</sup> (see attached). Going back, my recollection is that Metro declined participation in both plan processes including technical advisory meetings. Many others agencies were present. Staff may help clarify .

### **Statewide Goal 8 on Recreation**

Under Goal 8, we are not expected to provide for recreational opportunities as though we are Portland. The Goal Guidelines Metro Parks cities should be viewed within the context of our planning process. Metro Parks would have us think otherwise. We are expected to make reasoned provisions for residents of the jurisdiction and for visitors within the carrying capacity of air, land, water or natural resources. I think Guideline 11 is particularly important here. I believe the record shows the CACs of the Sauvie Island/MC Plan and the new Comp. Plan, in crafting recreation policy, acted judiciously & responsibly.

### **On the “Complementary” Language at Recreational Policies**

First, I do not think the language is as onerous as opponents make it to be. I prefer the existing language particularly in how it seemingly holds the line better on cumulative impacts, commonly an area of weakness in many policies. Secondly, abandoning the language amounts in part, to a reversal of the Sauvie Island plan; something we promised not to do. For consistency in regulation and for the fragile resources of the affected SEC natural areas, that same language has been extended to the West Hills. Metro makes the very same plea for consistency. Comprehensive planning is an approach to planning that is inclusive and considers all known factors and interrelationships among these factors. The the SIMC CAC, Comp. Plan CAC and staff in sum were engaged in that process for several years. On the other hand, the Metro Parks objective is narrow and without the wider context. There are many irrevocably committed and conflicting land uses both present and future in the Plan area. (logging, farming, roads, and the myriad of compromises that come with residential use for example) that Metro Parks is simply not contemplating or weighing. I support the existing language for all of these reasons.

### **Conclusion**

Having attended 13 of the 15 Comprehensive Plan CAC meetings as a non-voting member, and having attend dozens of SIMC meetings including technical advisory sessions, I'm asking that you have give the benefit of doubt to the years of work that is represented in both of these plans. The CACs and planning staff are worthy of our support. I encourage you to ask questions of staff and members of the CACs that might be present. While I'm sure some of the Metro technical fixes are fine, I am unaware of any CAC members supporting substantive changes, nor do I.

Sincerely,

Chris Foster

August 19, 2016

Chair Deborah Kafoury and Commissioners  
Multnomah County Board of Commissioners  
501 SE Hawthorne Blvd, Suite 600  
Portland, Oregon 97214

Subject: Update to Multnomah County Comprehensive Plan

Dear Chair Kafoury and Commissioners:

Thank you for this opportunity to testify on the proposed update to the Multnomah County Comprehensive Plan (the Plan). For the most part, I am quite pleased with the proposed policies set forth in the Plan. However, I object to some wording changes that the Planning Commission is recommending that would amend the adopted Sauvie Island/Multnomah Channel Rural Area Plan (SIMC Plan), and I strongly object to the changes to the SIMC Plan that Metro is advocating in its August 4, 2016 letter to the Board. I urge the Board to restore the language in the adopted SIMC Plan and to reject Metro's proposed changes.

Approximately one year ago, the Board *unanimously* approved adoption of the SIMC Plan. The Board's action followed years of meetings and hearings on that plan. Dozens of Sauvie Island residents participated in that process and testified orally or in writing in support of the SIMC plan. They emphasized several points in their testimony:

- They wanted a real working document, not something that would sit on a shelf.
- They wanted a document that contained clear, substantive policies that had "teeth" and provided meaningful protection for the area's agricultural and natural resources, rather than vaguely worded, wishy-washy policies that could be interpreted to allow virtually any use or activity. They wanted clarity, certainty and commitment.
- They were greatly concerned by already high levels of visitation on the island.
- They wanted assurances that the Board would not change the SIMC plan when it considered its update to the Comprehensive Plan.

Already, the Planning Commission is recommending that the words "complement", "complementary" and "in harmony with" in the adopted SIMC Plan be changed to "consistent with". And now Metro is requesting plan amendments that would weaken protections for resource lands by employing more ambiguous language. **Council approval of those changes would constitute a betrayal of the promise made to the Sauvie Island and Multnomah Channel community that the SIMC Plan would not be changed as part of the Comprehensive Plan update process. Hence, I urge the Board to reject both Metro's and the Planning Commission's proposed amendments to the adopted SIMC Plan.**

**A. Natural Resource Protection Requires Policies that are Meaningful. The Adopted SIMC Plan Provides those Policies.**

The wording of policy language is critical. For instance, words like “shall” and “must” are mandatory words that express a clear intent that the underlying policy be achieved. In contrast, words like “may” or “should” are advisory, not mandatory, and need not be adhered to. As indicated even in the adopted SIMC Plan, there are places where words like “may” or “should” are appropriate, but there also are places where mandatory language is required to ensure the desired results.

**When residents in the SIMC planning area proposed alternative language to that which staff had recommended for the SIMC Plan, they chose their words very carefully and intentionally.** The Planning Commission accepted most of these word changes and the Board, with tremendous community support, unanimously adopted these policies. These words were intended to be meaningful and mean what they say.

Now, Metro is challenging wording in the adopted SIMC Plan as part of the Comprehensive Plan update process. The words it dislikes are “complementary to”, “complement”, “maintain harmony with”, and “consistent with” (which is a word the Planning Commission substituted for the three previous words). It asks the Board to use the word “compatible” in their place. The policies in which these words can be found are adopted SIMC Plan policies 4.2 and 4.3. They also appear, with the words “consistent with”, in the draft Comprehensive Plan at policies 8.9 and 8.10.

*Board-adopted* SIMC Plan Policy 4.2(A) states: “Ensure activities will **complement** natural and environmental resources of local and regional significance.” Adopted Policy 4.2(b) states: “Ensure that Howell Territorial Park uses and improvements **maintain harmony with** the rural character of the plan area as well as natural and cultural resources.” Adopted Policy 4.3 states: “Support only those recreational activities within the rural plan area that are **complementary to and do not negatively impact** natural and environmental resources on Sauvie Island and along the Multnomah Channel and its tributaries that are identified in Goal 5 and in the Metro Greenspaces Master Plan and lands approved in Metro’s Acquisition Refinement Plan.” (emphasis added.)

The Planning Commission recommends changing these policies by substituting “consistent with” for “complement”, “maintain harmony with” and “complementary to”. Metro wants to replace those words and “consistent” with “compatible with” and also change “do not negatively impact” to “do not significantly impact”. **Both the Planning Commission’s and Metro’s proposed changes are substantive changes. The Board should reject these proposed changes and retain the original, community-supported language in the adopted 2015 SIMC Plan.**

The words shown above have multiple meanings. For the words Metro likes, it provides only the definition it likes, ignoring other definitions that are out of context. But regrettably, for those words it objects to, like “complementary” and “undue” (used in a new policy), Metro

provides only definitions that are out of context and omits more appropriate definitions that fit the context. By so doing, Metro seeks intentionally to mislead the Board. Such behavior is manipulative and deceptive. It is both out of character for and unbecoming to that agency.<sup>1</sup>

Moreover, Metro's arguments belie what Metro itself identifies as "the three most critical elements of a comprehensive plan update process": 1) diverse citizen involvement; 2) partnering public agency coordination; and 3) transparency. For the reasons set out below, I ask the Board to reject Metro's proposed amendments in favor of the stronger and more meaningful choice of wording supported by the SIMC community.

"Complementary to" is a term carried over from Policy 20 of the 1997 SIMC Plan. Hence, it is not a term new to Multnomah County planning. **The Merriam-Webster Dictionary identifies the "simple definition" of "complementary to" as "going well together; working well together"**. This fits the context of SIMC Policy 4.3. (Similarly, for "**complement**", the Oxford Dictionary identifies "harmonize with" as a synonym.)

But Metro failed to disclose this definition to the Board. Instead, Metro identified four other definitions that do not fit the context of Policy 4.3 (*e.g.*, "relating to or constituting one of a pair of contrasting colors that produce a neutral color when combined in suitable proportions – see Metro letter, page 9) and then used those definitions to argue that "complementary" is "an ambiguous and inappropriate word standard" that is "unworkable" and "should not be repeated." Metro's effort to misinform and mislead the Board regarding the appropriate meaning of this word, in its proper context, could not be more blatant.

As noted the Planning Commission, during its proceedings, substituted "consistent" for the words contained in the adopted SIMC Plan. That explains why the word appears in proposed Policies 8.9 and 8.10. The Merriam-Webster Dictionary defines "**consistent**" to mean "marked by harmony, regularity or steady continuity"; "showing steady conformity to character" and "of the same quality". While not a bad word, "consistent" is not quite as meaningful, emphatic or positive as "complementary to", which again is defined to mean "going well together; working well together." The Sauvie Island community recommended using the words "complement" and "complementary to" in the 2015 SIMC Plan. With history, substance and community support, those words should be retained.

Metro advocates use of the word "**compatible**" (Metro letter, page 3), but compatible is a weaker and less positive term. For instance, uses like golf courses might be deemed "compatible" with environmental and natural resources, since local governments may allow them in EFU zones, but given that golf courses are land extensive, remove land from other uses, create an unnatural landscape and may involve herbicide and pesticide spraying, they do not "go" or "work well together" with protection of resources. Sauvie Islanders made

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<sup>1</sup> As one who has worked closely with Metro for most of my 38 year professional career, and as one who strongly supports the Greenspaces program, I was quite taken aback by the tone of this letter.

clear several decades ago that Sauvie Island is not an appropriate location for golf courses, but “compatible” would allow them to locate there.

Metro argues (Metro letter, page 4) that “compatible” should be selected over “consistent” or “complementary” because the current County Code does not define these terms (or the term “undue impacts” discussed below). But Code amendments will follow to implement the Plan, or the terms can be defined in the Plan glossary. If so, **I recommend the following definitions:**

- *Complementary*: going together well, working together well
- *Undue*: more than is reasonable or necessary
- *Consistent* (because this term appears elsewhere in the Plan): of the same quality or character; marked by harmony

Returning to “compatible”, Metro apparently believes this term is unambiguous. Yet if I apply the same technique to this word that Metro applied in addressing “complementary”, I must point out other dictionary definitions of “compatible” that, using Metro’s logic, would render this term “inappropriate” and “unworkable”. For instance, Merriam-Webster defines “compatible” to mean: “capable of cross-fertilizing freely or uniting vegetatively”; “capable of forming a homogeneous mixture that neither separates nor is altered by chemical interaction”; “capable of being used in transfusion or grafting without immunological reaction” \* \* \*. You get the picture. If Metro did not favor the word “compatible”, surely Metro would have brought these definitions to your attention.

**In advocating for looser and more ambiguous language, Metro overlooks or ignores the substantial citizen involvement that served as the foundation for the SIMC Plan.** As noted, this Plan had tremendous public support. It is also noteworthy that Metro chose not to participate in the development of that plan, despite County efforts to engage affected public agencies. Metro never appeared before the Planning Commission or Board during the SIMC Plan adoption process – quite possibly because Metro found nothing to be objectionable. Only now is it asking the Board to ignore that citizen involvement for undefined personal reasons.

**In advocating for weaker, more ambiguous language, Metro also overlooks the substantial agency participation in the SIMC planning process.** Many policies were written or revised with agency assistance. Indeed, agencies like Oregon Department of Fish and Wildlife took a strong stand supporting the citizen-proposed SIMC Plan language. And no agency objected to that language before the Board.

**Metro’s letter also lacks transparency.** Metro’s failure to be forthright and upfront in providing definitions of terms it dislikes reveals a lack of transparency. Also, Metro talks of “balancing” recreational needs and uses with natural resource protection, but nowhere does it explain just what it means by this. As noted, islanders wanted more certainty in the SIMC Plan, and the plan provides this. Now Metro is asking for carte blanche discretion. The Board must deny that request.

On page 2 of its letter, Metro speaks of policies frustrating or burdening its ability to serve a diverse and growing population of county residents and their needs. Just what does this mean, and how is this so? Metro provides no answers to these questions. Does Metro want to convert portions of Howell Park into ball fields, playgrounds, golf courses, motocross tracks? Does it want to hold concerts or provide amusement park rides there, or engage in the kinds of agri-tourism activities that adopted SIMC Policy 1.8(b) prohibits? Who knows? **Metro's parks and recreation mission is to protect water quality, fish and wildlife habitat and create opportunities to enjoy nature. Howell Park includes trails and natural areas that achieve this policy. The adopted SIMC Plan does not change this or prevent Metro from adding more trails. It simply provides that uses and improvements there continue to "maintain harmony with the rural character of the plan area as well as natural and cultural resources." This existing language is appropriate, best fits the character of the island and the desires of islanders, and must be retained.**

#### **B. Response to Metro Recommendations for Other Subareas**

For areas like the West Hills and East County, I defer to the particular desires of the residents of those areas. As I understand it, West Hills rural residents favor policies with wording similar to those adopted for Sauvie Island, while East County residents may desire a higher level of flexibility in plan language.

But natural resource habitat protection is a matter of significant personal concern and importance to me, so I wish to comment on several of Metro's proposed changes to that portion of the plan. Proposed Policy 5-27 reads: "Protect significant native fish and wildlife habitat and wildlife corridors and specifically limit conflicting uses within natural ecosystems and sensitive big game winter habitat areas. Metro asks that the Board strike "natural ecosystems" because it is confusing in its context. Metro letter, page 6. I agree that better wording can be used. I recommend substituting "these habitats" for "natural ecosystems."

Also on page 6, Metro asks that the Board add four new paragraphs discussing Metro. It may be appropriate to add the first paragraph, describing who Metro is, but the remaining proposed additions go well beyond the context of this section of the Plan.

In its proposal #4 on page 7 of its letter (Goals, Policies and Strategies), Metro asks that the County strike the word "rural" from the goal, questioning why the Parks and Recreation goal "is described as only intended to meet the recreational needs of the county's *rural* residents." But the goal is "To help meet the recreational needs of Multnomah County rural residents *and visitors to its rural areas \* \* \**" (emphasis added) Given that the County has planning jurisdiction over only the *unincorporated* areas of the county, the goal makes good sense as written and should retain the current language.

On page 8, under Parks and Recreation Planning, Metro asks that "consistent" as used in Policy 8.2 be changed to "compatible." For the reasons stated earlier in this letter, this request should be denied. I believe "that are complementary" would be an even better term.

Also on page 8, Policy 8.8 for the West Hills provides: "Support only those recreational activities within the West Hills area that are consistent with and do not cause undue negative impacts on natural and environmental resources that are identified in Goal 5." Metro again asks that "consistent" be changed to "compatible" and that "significant" replace "undue negative." While I prefer the word "complementary", "consistent" is a better word than "compatible."

As to "undue negative impacts", Metro re-employs the same misleading, deceptive technique it used with the word "complementary." Metro states that "according to Webster's, 'undue' means: '1: not due, not yet payable 2: exceeding or violating proprietary or fitness.'" As such, it calls the term "inappropriate." **But Metro fails to disclose the very first definition Webster's provides for "undue", which is "more than is reasonable or necessary."**<sup>2</sup> **That is the definition that fits the context of the policy.** Again, Metro is trying to mislead and fool the County. Interestingly, Webster's provides two examples of "undue" in a sentence: "1. These requirements shouldn't cause you any undue hardship. 2. His writing is elegant without calling undue attention to itself." But Metro failed to disclose this too.

I understand and appreciate that Metro wishes to allow some recreational uses in the West Hills that are more intensive than those found on its Sauvie Island property. But "significant" impacts is too loose and broad. "Undue" sets appropriate limits, allowing some negative impacts, but within reason. While Metro may complain that this term is new and untested, it is nonetheless appropriate, and it has local citizen support. I ask that it be retained.

### C. Relationship of Comprehensive Plan to Subarea Plans.

To the best of my recollection, during the SIMC planning process I asked that when the Comprehensive Plan was updated, it include a policy stating something to the effect that in the event comprehensive plan and SIMC plan policies should be deemed to conflict, the SIMC plan will control. In correspondence to the County, Carol Chesarek, a West Hills resident, has proposed a policy of this nature that extends to all subareas. I support her policy, and I urge the Board to include it in the Comprehensive Plan, but with a slight wording change from what Carol recommends. I would add a policy that reads as follows.

"Where policies specific to individual subareas are more stringent or conflict with policies applicable countywide, the subarea policies control."

Such a policy assures that the interests and wishes and hard work of local communities in developing subarea plans specific to their needs and wants are not superseded.

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<sup>2</sup> The Oxford dictionary defines "undue" as "unwarranted or inappropriate because excessive or disproportionate." This too is a reasonable definition.

Multnomah County Board of Commissioners  
August 19, 2016  
Page 7

Thank you for your consideration of and attention to these important issues.<sup>3</sup>

Very truly yours,



Mark J. Greenfield

Cc: Adam Barber  
Michael Cerbone  
Jed Tomkins  
Andy Shaw  
Anne Squier

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<sup>3</sup> Copies of definitions taken off the internet are attached.

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## complementary

play

*adjective* **com-ple-men-tary** \kām-plā-'men-(ə-)rē\

Popularity: Top 10% of words

### Simple Definition of **complementary**

- : completing something else or making it better : serving as a complement
- — used of two things when each adds something to the other or helps to make the other better
- **going together well : working well together**

*— Metro ignored this*

Source: Merriam-Webster's Learner's Dictionary

Examples: complementary in a sentence ✓

- -
- -
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### Full Definition of *complementary*

1. 1 : relating to or constituting one of a pair of contrasting colors that produce a neutral color when combined in suitable proportions
2. 2 : serving to fill out or complete
3. 3 : mutually supplying each other's lack
4. 4 : being complements of each other (see complement) <complementary acute angles>
5. 5 : characterized by the capacity for precise pairing of purine and pyrimidine bases between strands of DNA and sometimes RNA such that the structure of one strand determines the other

} Metro used  
- there  
instead

### complementarily

pləy-ˈmən-(ə-)rə-lē, -(ə)ˈmən-ˈtēr-ə-lē, -ˈtā-rə-ˌ\ *adverb*

### complementariness

pləy-ˈmən-(ə-)rē-nəs\ *noun*

### complementary

*noun*

See complementary defined for English-language learners

See complementary defined for kids

### Examples of complementary in a sentence

— Thea Fir the definition  
Metro ignored and the  
TEAM AD used  
in the SIMC  
PLAN.

1. ... hot and sour soup encapsulates the Taoist principle central to Chinese culture: yin and yang, the notion of balancing the universe's opposing yet *complementary* forces. —Rebecca Hays, *Cook's Illustrated*, January & February 2006
2. Once Austin got used to what he had on, Jerry was going to talk him into a neck scarf of *complementary* colors and a cream pullover. —Alice Munro, *Atlantic*, January 1990
3. Vann and Ellsberg were the odd couple, difficult men from different worlds satisfying *complementary* needs in each other. —Neil Sheehan, *A Bright Shining Lie*, 1988
4. ... it was becoming more and more clear to him that Miss Bart herself possessed precisely the *complementary* qualities needed to round off his social personality. —Edith Wharton, *The House of Mirth*, 1905
5. She wore a new outfit with a *complementary* scarf.
6. My spouse and I have *complementary* goals.



### Origin and Etymology of complementary

(see complement)

First Known Use: 1829

### Related to complementary

Synonyms

correlative, reciprocal, supplemental, supplementary

Antonyms

- Complement clauses are subordinate clauses that function as complements of a word: that they were too noisy in *She told them that they were too noisy*.
- Recall that a verb governs an object, and the head of a phrase governs the complement.
- For many people, 'feel like' has become a complex verb that takes sentential complements.
- [Get more examples](#)

3.1 (In systemic grammar) an adjective or noun that has the same reference as either the subject (as mad in *he is mad*) or the object (as mad in *he drove her mad* or manager in *they appointed him manager*).

4 [mass noun] Physiology A group of proteins present in blood plasma and tissue fluid which combine with an antigen-antibody complex to bring about the lysis of foreign cells.

Example sentences

- An example is a transfusion reaction in which IgG and IgM anti-red-cell antibodies activate complement and cause cell lysis.
- Red blood cell susceptibility to complement was ruled out via a negative sucrose hemolysis test thus precluding a diagnosis of PNH.16
- The DAT is usually positive, confirming the presence of IgG antibodies with or without complement on the red cells.
- [Get more examples](#)

## verb

COMPLEMENT

Pronunciation: /'kɒmplɪmɛnt/

[with object]

1 Contribute extra features to (someone or something) in such a way as to improve or emphasize their qualities: *a classic blazer complements a look that's smart or casual*

More example sentences

- This capability complements policy-based management features that allow automated or advised actions, based on conditions detected through advanced diagnostics.
- Riding last year's breakthrough, he's using slightly improved on-base skills to complement his power-speed combination.
- There was something about his personality that lent itself to New York, a stubborn quality that complements a stubborn city.
- [Get more examples](#)

Synonyms

**accompany**, go with, round off, set off, suit, harmonize with, be the perfect companion to, be the perfect addition to, add the finishing touch to, add the final touch to, add to, supplement, augment, enhance, complete

[View synonyms](#)

1.1 Add to or make complete: *the proposals complement the incentives already available*

More example sentences

- The Nubira complements the already strong line up of Matiz, Kalos and Tacuma.
- Bosses at Pizza Pioneer, which in July will celebrate its 16th anniversary, have decided to open during the day to complement its already buoyant evening business.
- I am pleased to hear that a good variety of businesses have made the decision to locate here and this will complement the already thriving business community locally.

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consistent

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Follow:



consistent

play

adjective con-sis-tent \kən-'sis-tənt\

Popularity: Top 10% of words

Simple Definition of **consistent**

— PLANNING COMMISSIONER ZEM

- : always acting or behaving in the same way
- : of the same quality; *especially*: good each time
- : continuing to happen or develop in the same way

Source: Merriam-Webster's Learner's Dictionary

Examples: consistent in a sentence

- -
- -
- -
- -
- -
- -

Full Definition of **consistent**

1. *Archaic*: possessing firmness or coherence
2. *2 a*: marked by harmony, regularity, or steady continuity: free from variation or contradiction <a consistent style in painting> *b*: marked by agreement: compatible — usually used with *with* <statements not consistent with the truth> *c*: showing steady conformity to character, profession, belief, or custom <a consistent patriot>
3. *3*: tending to be arbitrarily close to the true value of the parameter estimated as the sample becomes large <a consistent statistical estimator>

## consistently

ˈkɒn.sɪ.stəntlɪ *adverb*

See [consistent](#) defined for English-language learners

See [consistent](#) defined for kids

## Examples of consistent in a sentence

1. ... the sixty-five-year-old filmmaker continues to practice his craft with *consistent* artistic aplomb. —Peter Travers, *Rolling Stone*, 30 Aug. 2001
2. I am not *consistent* about giving vibrancy and other kinds of input to a relationship. ... There are periods when I am the most attentive and thoughtful lover in the world, and periods, too, when I am just unavailable. —Toni Cade Bambara, "A Conversation with Claudia Tate," in *The Story and Its Writer*, edited by Ann Charters, 1987
3. One of the strengths of Blake's letters is their *consistent* readability ... —William Styron, *This Quiet Dust and Other Writings*, (1953) 1982
4. The rhythm of the gesture never varied. The paper flew in identically the same arc at each doorway, landed in identically the same spot. It was impossible for anybody to throw with such *consistent* perfection. —Madelaine L'Engle, *A Wrinkle in Time*, (1962) 1976
5. He is a *consistent* supporter of the museum.
6. We need to be more *consistent* in handling this problem.
7. Customers expect that the quality of service they receive will be *consistent*.
8. The pain has been *consistent*.
9. Your grades have shown *consistent* improvement this school year.
10. Their descriptions of the accident were *consistent*.
11. The decision was *consistent with* the company's policy.

## Origin and Etymology of consistent

Latin *consistent-*, *consistens*, present participle of *consistere* (see [consist](#))

First Known Use: 1638

## Related to consistent

### Synonyms

accordant, coherent, compatible, concordant, conformable (to), congruent, congruous, consonant, correspondent (with or to), harmonious, nonconflicting, of a piece

### Antonyms



5. *S*: designed to work with another device or system without modification; *especially*: being a computer designed to operate in the same manner and use the same software as another computer

## compatibility

ˈkɒm.pə.təˈbɪ.lə.ti *noun*

## compatible

*noun*

## compatibleness

ˈkɒm.pə.təˈbəl.nəs *noun*

## compatibly

ˈkɒm.pə.tə.bəl *adverb*

See [compatible](#) defined for English-language learners

See [compatible](#) defined for kids

## Examples of *compatible* in a sentence

1. Two people with *compatible* personalities
2. This printer is *compatible* with most PCs.

Enter your last name to find out.

## Origin and Etymology of *compatible*

Middle English, from Medieval Latin *compatibilis*, literally, sympathetic, from Late Latin *compati*

First Known Use: 15th century

## Related to *compatible*

### Synonyms

[agreeable](#), [amicable](#), [harmonious](#), [congenial](#), [frictionless](#), [kindred](#), [unanimous](#), [united](#)

### Antonyms

[disagreeable](#), [discordant](#), [disharmonious](#), [disunited](#), [incompatible](#), [inharmonious](#), [incongenial](#)

### Related Words

[pacific](#), [peaceable](#), [peaceful](#); [collaborating](#), [cooperative](#), [symbiotic](#), [synergetic](#), [synergic](#); [noncompetitive](#), [nonconflicting](#), [uncompetitive](#); [sympathetic](#), [tolerant](#), [understanding](#); [affable](#), [amiable](#), [cordial](#), [friendly](#), [genial](#), [neighborly](#)

### Near Antonyms

[antagonistic](#), [antipathetic](#), [clashing](#), [conflicting](#), [hostile](#), [inimical](#), [unfriendly](#); [belligerent](#), [contentious](#), [quarrelsome](#); [contradicting](#), [contradictory](#), [contrary](#), [opposing](#), [opposite](#); [competing](#), [competitive](#), [rivaling](#) (or [rivaling](#))

## Rhymes with *compatible*

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undue

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## undue

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adjective un-due ˈdū, -ˈdyū

Popularity: Bottom 40% of words

### Simple Definition of *undue*

- **more than is reasonable or necessary**

Source: Merriam-Webster's Learner's Dictionary

Examples: *undue* in a sentence

- 
- 
- 
- 
- 

### Full Definition of *undue*

*Fitz context of policy; Merro ignored this*

- 1. not due: not yet payable
- 2. exceeding or violating propriety or fitness: excessive <undue force>

More mentioned these instead

See undue defined for English-language learners

See undue defined for kids

### Examples of *undue* in a sentence

- 1. These requirements shouldn't cause you any *undue* hardship.
- 2. His writing is elegant without calling *undue* attention to itself.

these fit the definition that fits the context of the policy.



14th Century

### First Known Use of *undue*

14th century

### Related to *undue*

#### Synonyms

baroque, devilish, exorbitant, extravagant, extreme, fancy, immoderate, inordinate, insane, intolerable, lavish, overdue, overextravagant, overmuch, overweening, plectronic, steep, stiff, towering, unconscionable, excessive, unmerciful

#### Antonyms

muddling, moderate, modest, reasonable, temperate

#### Related Words

boundless, endless, immeasurable, infinite, limitless; unbearable, unjustifiable, unwarranted; improper, inappropriate, thick, unseemly; unrestrained

#### Near Antonyms

deficient, inadequate, insufficient; minimal, minimum

### Rhymes with *undue*

acorn, aloo, adieu, ado, Agnew, arenew, amsrew, anew, askew, babu, Baku, bamboo, battu, battue, bayou, bedew, beshrew, bestrew, bijou, boo-boo, bouba, brand-new, breakthrough, burgoo, cachou, can-do, canoe, caoutchouc, Carew, Cebu, Chonju, construe, Corfu, corkscrew, coypu, CO, cuckoo, curfew, debut, Depew, doo-dee, eau, endue, ensue, eschew, floor-through, fondue, fardo, Gansu, Gantoo, Gifu, goo-goo, GO, ground crew, gumshoe, guru, hairdo, hereto, Hindu, home brew, Honslu, horseshoe, how-to, H.C. Hutt, igloo, imbrue, imbue, IQ, jackscrew, k2, Kansu, karoo, Karoo, kazoo, Khufu, kung fu, Kwangju, leadcrew, lean-to, long view, make-do, Matthew, me-too, mildew, milieu, miscue, misdo, mummy, non-L3, old-shoe, one-two, on view, outdo, perdu, Peru, poilu, prau, preview, pursue, purview, ragout, redo, renew, Rentew, review, revue, rough-hew, run-through, sandshoe, Sardou, see-through, set-to, setcrew, shampoo, sinew, skiddoo, snafu, snowshoe, soft-shoe, span-new, subdue, surtout, taboo, Jaegu, tattoo, thank, you, thereto, thumbscrew, to-do, too-low, tree shrew, undo, unglue, uncrew, untrac, vanu, vendue, venue, virtue, voodoo, wahoo, walk-through, wheretrough, whereto, who's who, waddyew, yahoo, yoo-hoo

### Law Dictionary

#### undue

play.

## adjective

Unwarranted or inappropriate because excessive or disproportionate. *this figure did not give rise to undue concern*

*fits context of policy*

More example sentences

- It was characterised by an excessive and even undue respect for authority and authoritarianism.
- Cllr Joe Dunne said he was concerned at what appears 'to be an undue delay' in putting the scheme in place.
- Anyone who continues to look at the new environment from an outdated perspective will become embroiled in excessive and undue worries.
- [Get more examples](#)

### Synonyms

**excessive**, extreme, immoderate, intemperate, disproportionate, inordinate;  
 fulsome, superfluous, too much, too great;  
 uncalled for, unneeded, unnecessary, non-essential, not required, needless;  
 unwarranted, unjustified, unreasonable;  
 inappropriate, unmerited, unsuitable, unseemly, unbecoming, improper, ill-advised  
[View synonyms](#)

## For editors and proofreaders

Line breaks: un|due

## Definition of undue in:

- [US English dictionary](#)
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Rithy KHUT &lt;rithy.khut@multco.us&gt;

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**Fwd: Proposed Comprehensive Plan**

1 message

---

Rich FAITH <rich.faith@multco.us>  
To: Rithy Khut <rithy.khut@multco.us>

Mon, Aug 22, 2016 at 8:08 AM

From: Mark J. Greenfield

Sent: Sunday, August 21, 2016 10:47 AM  
To: Commissioner Jules Bailey ; Kafoury Deborah ; district2@multco.us ; district3@multco.us  
Cc: Multnomah County Planning Planning County ; Multnomah County Planning Planning County ; andy.shaw@oregonmetro.gov ; Tomkins Jed  
Subject: Proposed Comprehensive Plan

Dear Chair Kafoury and Commissioners:

I read through the draft Comprehensive Plan again this morning and have several comments to make about it.

1. Overall, this plan is terrific and exemplary. There is such a strong emphasis on resource protection. I believe this is fully consistent with the intent of statewide land use planning, and I greatly appreciate it. The Natural Resources and Agricultural Lands sections are excellent. I am so pleased that the County has taken the work we did to protect Sauvie Island farmland and pretty much applied it countywide. And I am tremendously impressed with the job that was done and the direction this plan takes regarding Natural Resource protection. It is a model for the state. Staff, the CAC and the Planning Commission deserve great credit for this.
2. While this plan repeals the 2015 SIMC Rural Area Plan at page 1-22, which makes me somewhat uncomfortable, it does incorporate the policies of that plan into the whole of the new plan. Some of those policies are incorporated to apply countywide, while others remain specific to the island. In several instances, I discovered wording changes to the SIMC policies that were adopted. Sometimes additions are made to the policies, as with the policy on roadway maintenance in the TSP. The addition is a positive one and I do not object to it. Similarly, the additions and changes made where the policies are written to apply countywide do not change the direction or meaning of the policy and are fine.
  - a. The one place where I do have problems with word changes is in Parks and Recreation Policies 8.9 and 8.10. For the reasons stated in my letter to the Board dated August 19, 2016, the wording of those policies should be changed to revert to the wording the Board adopted for SIMC Policies 4.2 and 4.3. This is the only circumstance I found where the proposed change weakened the language in the adopted 2015 SIMC Plan.
  - b. I have also identified an inadvertent omission. In policy 3.20(3), a word or two is missing. I think the fix is to change the word "to" to "shall" following "(EFU)", or begin the sentence with "Require" to make it consistent with the adopted SIMC policy.
  - c. One other omission, which I assume was inadvertent. The plan contains a policy requiring that noise levels associated with gatherings comply with state and local noise ordinances to maintain the rural character", but it does not contain similar language for events at farm stands. SIMC Policy 1.10 addressed both. I recommend that the language in Comp Plan Strategy 3.5-2 be added to the plan to address events at farm stands. If you wish, this can be limited to Sauvie Island.
3. Especially since this plan purports to repeal the 2015 SIMC Plan, and also because it provides at 1-22 that "with respect to all questions of interpretation of this Plan, the provisions of this Plan control over the provisions of the now-repealed SIMC appended to this Plan" (something that also makes me uncomfortable), I think it becomes especially important to add the new proposed policy stating "Where policies specific to individual subareas are more stringent or conflict with policies applicable countywide, the subarea policies control."

4. I had a long talk (nearly 45 minutes) with Andy Shaw of Metro after he received my letter to the Board. He was upset that I accused Metro of "intentionally" trying to mislead the Board in Metro's August 4 letter to the Board. I cannot say with absolute certainty that this was intentional, but I can say that having practiced land use law for 38 years prior to retirement, I've seen the technique of omitting relevant definitions (or relevant caselaw) used on a number of occasions by attorneys and, generally, appellate bodies (LUBA, the courts) do not appreciate it. Also, the test for interpreting the meaning of a word or phrase in a local comprehensive plan is to give the term its "plain, natural and ordinary meaning" within the text and context of the plan. *Jaqua v. City of Springfield*, 193 Or App 573 (2004). I still fail to understand how Metro could offer definitions for "complementary" and "undue" that are not plain, natural or ordinary and do not fit the context of the policy, omit the definitions that are plain, natural and ordinary and do fit the context, and now claim this was accidental or unintentional. Be that as it may, Andy is not an attorney and he did not write the letter (apparently one of Metro's attorneys wrote it, although it is signed by someone else).

Andy also claimed that I failed to provide all definitions for the words I address, but I provide in the attachments all definitions for the words at issue. The definitions I highlighted are those I believe are the most plain, natural and ordinance for the words at issue, within the context of the policies given. Further, they are consistent with what Sauvie Island and channel residents intended when they recommended these words for inclusion in the SIMC Plan. I urge the Board to accept the definitions I've offered and to add them to the Comprehensive Plan glossary.

Thank you for your consideration of these matters. Again, this is an overall excellent plan, and you should be quite proud of it.

Mark J. Greenfield  
14745 NW Gillihan Road  
Portland, Oregon 97231  
(503) 227-2979  
markgreenfield@involved.com



Rithy KHUT &lt;rithy.khut@multco.us&gt;

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**Fwd: Proposed Comprehensive Plan**

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Rich FAITH <rich.faitth@multco.us>  
To: Rithy Khut <rithy.khut@multco.us>

Mon, Aug 22, 2016 at 8:08 AM

----- Forwarded message -----

From: Ron Eber &lt;ronaldeber@comcast.net&gt;

Date: Sun, Aug 21, 2016 at 1:08 PM

Subject: Re: Proposed Comprehensive Plan

To: "Mark J. Greenfield" &lt;markgreenfield@involved.com&gt;, Commissioner Jules Bailey &lt;jules.bailey@multco.us&gt; ,

Kafoury Deborah &lt;deborah.kafoury@co.multnomah.or.us&gt;, district2@multco.us, district3@multco.us

Cc: Multnomah County Planning Planning County &lt;adam.t.barber@multco.us&gt;, Multnomah County Planning Planning

County &lt;michael.cerbone@multco.us&gt;, andy.shaw@oregonmetro.gov, Tomkins Jed &lt;jed.tomkins@multco.us&gt;

Commissioners: I'd like to support the comments submitted by Mr. Greenfield and to specifically emphasize two things:

1. The more specific sub area policies or the more restrictive should control. This is the usual way such inconsistencies are handled; and
2. Address the inconsistencies and possibly inadvertent omissions that he has identified. Otherwise in any latter disputes, hearings officers, LUBA or the Courts will view them as intentional and will have to assume that they were intentional and were meant to mean something different. Words and phrases have meaning and even the slightest differences can lead to unintended interpretations.

Thanks for your consideration of these comments.

Ron Eber



Rithy KHUT &lt;rithy.khut@multco.us&gt;

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**Fwd: Update to Multnomah County Comprehensive Plan**

---

Rich FAITH <rich.faith@multco.us>  
To: Rithy Khut <rithy.khut@multco.us>

Tue, Aug 23, 2016 at 8:39 AM

From: Marcy Houle <newmoonfarms@gmail.com>  
Date: August 22, 2016 at 8:08:32 PM PDT  
To: Commissioner Jules Bailey <jules.bailey@multco.us>, Kafoury Deborah <deborah.kafoury@co.multnomah.or.us>, district2@multco.us, district3@multco.us, district4@multco.us, district1@multco.us  
Subject: Update to Multnomah County Comprehensive Plan

Dear Chair Kafoury and Commissioners:

I write to you as a member of the Citizen Advisory Committee who worked for over 15 months carefully studying, reviewing, and drafting updates to the rural Multnomah County Comprehensive Plan.

From this position, I would like to voice a deep concern over a requested modification to Policy 8.8, proposed by Metro, that would weaken protections for natural resources across all of the West Hills.

This policy, 8.8, was discussed in depth at our CAC meeting on February 14, 2016. All 14 members present were aware of what could be the ramifications to 8.8, if different wording was used.

After diligent and thorough discussion, we chose, in unanimous agreement, to closely align our words with the Sauvie Island/ Multnomah Channel Rural Plan, which offered stronger language that we all felt was essential if the intent of Goal 5 was to be observed.

Being a resident of Sauvie's Island, I was also involved, as a citizen, with the 2015 SIMC plan, which was another long and thoughtful CAC process. Its outcome was exemplary, and I wish to thank Commissioner Bailey in particular for making it clear that the county will honor its commitment not to change the policies that were recently adopted. Natural resource protection was an important goal in this plan, and had been in the past.

I am especially cognizant of this because I was a member of the 1997 CAC for Sauvie Island/Multnomah Channel. During this process, precise wording for natural resource protection was also discussed. It was in this plan, in fact, that we first included policy language about recreation activities that were "complementary to" natural and environmental resources.

After all of this careful work, with historic precedence, opposition is today arising from METRO. METRO is requesting to change the clear intent that Multnomah County and Sauvie Island CAC's have carefully worded. This is worrisome indeed to all members of the Multnomah County CAC, as we know precisely the reason for METRO's advocacy to weaken the policy.

METRO, as we discussed in depth at our meeting on Feb. 14, 2016, seeks to lower standards for natural resource protection to make it easier to get their plan for recreational facilities approved by Multnomah County. They wish to change the word "complimentary" to a weaker version, "consistent"; further, they seek to limit any legal challenges.

This directly contradicts the full and robust agreement that the stronger word, complimentary, should be part of policy 8.8.

**Understanding where METRO was coming from, the entire CAC voted to strengthen the language, and thus offer more protection for the resource, keeping our intent consistent with Goal 5.**

While I, personally, would have liked to make the language entirely concordant with SIMC, and offer stronger protection, we reached a compromise that all felt was a good resolution: "8.8: *Support only those recreational activities within the West Hills area that are complementary to, and do not cause undue negative impacts on natural and environmental resources that are identified in Goal 5.*"

Speaking as a CAC member who was extremely involved in, not only this plan, but also the previous two Sauvie Island/Multnomah Channel plans, I adjure you to retain the language that our committee strove so hard to delineate. When we said "complementary" rather than "consistent", and wrote "do not cause undue negative impacts on natural and environmental resources" we meant this precisely and accurately.

That's right. *All of us.* A unanimous CAC.

Additionally, I know I speak for my other CAC members saying that we request that all subarea policies govern should there be any conflict with county wide policies.

Lastly, I wish to go on record to say I strongly agree with the comments and corrections to the Comprehensive Plan requested by Carol Chesarek and Mark Greenfield.

Thank you very much for your attention to this matter. It is my true hope that you will give due consideration to the hours and months of time all 16 members gave as we poured over these policies.

Why? It's because we all really care about the place we live, and our responsibility to leave it in good measure, full function, and retained beauty for future generations.

Sincerely,

Marcy Cottrell Houle

**Jerry Grossnickle**  
13510 NW Old Germantown Road  
Portland, OR 97231

August 23, 2016

Chair Deborah Kafoury  
Commissioner Jules Bailey, Commissioner Loretta Smith, Commissioner Judy Shiprack,  
Commissioner Diane McKeel  
Multnomah County Board of Commissioners  
501 SE Hawthorne Blvd., Suite 600  
Portland, OR 97214

Re: Multnomah County Comprehensive Plan update  
Planning for Habitat Protection and Recreational Opportunities

Dear Chair Kafoury and Commissioners:

I served as a member of Multnomah County's Community Advisory Committee for the Comprehensive Plan update and on its Air, Land, Water, Wildlife and Hazards subcommittee. I also served on Metro's North Tualatin Mountains Stakeholder Advisory Committee. During the period of these deliberations, I also served as President of Forest Park Neighborhood Association and now serve as Chair of its Land Use Planning Committee.

Having read Metro's August 4 comments to the Board of Commissioners, I feel compelled to add my own perspective on language in the Comprehensive Plan that seeks to accommodate both wildlife habitat protection and recreational opportunities in the county's natural areas.

The Comprehensive Plan should recognize that there are natural areas within the county that are not suited to a typical "balancing" formula, where recreational opportunities and wildlife resources are seen as equal goals on the same lands. One of these natural areas is in Metro's North Tualatin Mountains acquisition properties north of Forest Park.

It is disappointing to me that Metro would like to strike "to ensure wildlife connectivity" from the Plan's description of these lands, despite the fact that Metro explicitly relied on this goal when promoting the bond measures that provided funding for the acquisition. The CAC recognized that these lands were particularly important to the health of the natural areas of the West Hills not only for their habitat values, but also for their strategic location, and we very deliberately included the "to ensure wildlife connectivity" language in our draft to reflect that fact.

And indeed, these properties were selected by Metro because of their critically important location within the narrow forested neck that connects the West Hills to the larger natural

habitats of the Coast Range. Of course Metro should be able to describe its own reasons for purchasing the North Tualatin Mountains properties, but the CAC wanted to make sure that the Multnomah County Comp Plan acknowledges that one of the central reasons for preserving these particular natural areas is to preserve the wildlife corridors and connections that the West Hills area has to the Coast Range and its wildlife habitat. I recommend that this or similar language be retained in the Comprehensive Plan. It is important to the CAC, to Forest Park, to the Forest Park Neighborhood Association, to the residents of the West Hills, and of course to the wildlife of the West Hills, that these wildlife corridors and connections are protected, for they are important to the health of wildlife (both plant and animal) in all the remaining natural areas of the West Hills that depend on renewal and migration to and from the larger Coast Range habitat lands.

With this idea in mind, but also knowing Metro is planning to provide for some level of recreation on these lands, the CAC was deliberate in its choice of language. The CAC did not wish to prohibit recreational development, nor could we agree that the Sauvie Island (SIMC) formulation was completely applicable, so after considerable discussion we decided on wording that we think strikes the right balance between protecting natural areas and providing for recreational development in the West Hills. I believe that the additional tweaking by the Planning Commission (“complementary to” became “consistent with”) did not significantly weaken our recommendation:

(8.8) Support only those recreational activities within the West Hills area that are *consistent with*, and do not cause *undue negative* impacts on, natural and environmental resources identified in Goal 5. (italics added)

Metro objects to our language, and would change “consistent with” to “compatible with” and would change “undue negative” impacts to “significant” impacts.

In my opinion Metro’s suggestions do not improve the formulation and provide no discernible standards.

I have read the August 19 letter by Mark Greenfield and the August 21 letter written by Carol Chesarek and applaud their comments on this section, and in particular, I believe that the clarifying language offered by Ms. Chesarek would be a helpful addition to the Comprehensive Plan’s discussion of balancing recreational use with protection of natural resources (after second bullet of “Key Planning Issues and Supporting Information”, page 8 of Section 8):

“In the subarea policies for SIMC and West Hills, while a high bar is intended for recreational development in Goal 5 resource area, opportunities to enjoy Goal 5 resources may be allowed. When there is a conflict between conserving, restoring and enhancing resources and providing for enjoyment of them, the conservation, restoration and enhancement are to be predominant.”

Finally, in order for the Comprehensive Plan to provide a better framework for making sound decisions that appropriately balance natural resource and recreational use, there

should be an explicit recognition of the fundamental fact that some environmentally sensitive areas must be given a higher level of protection than other natural resource lands, and that recreational development in these areas should be subject to greater scrutiny.

While the paragraph mentioned above (the second bullet of Key Planning Issues, page 8 of Section 8) does point out that for recreational facilities located within environmentally sensitive areas, it is important to balance recreation needs with natural resource management and protection objectives, particularly for riparian areas and wildlife habitat, there is no specific policy or strategy that describes how such balance is to be achieved. Ms. Chesarek's suggested addition helpfully provides that when there is a conflict between Goal 5 resource protection and recreational development, resource protection should predominate.

A further common-sense refinement could be that the Comp Plan explicitly state that **the greater the environmental significance a natural area has, the greater the scrutiny a recreational development in that area should have.** This analytical framework would have helped Metro's North Tualatin Mountains Stakeholder Advisory Committee in our deliberations on the recreational development vs. environmental protection issues that were often the primary focus of our SAC meetings. In the end, the Committee's recommendations did in fact give greater scrutiny to recreational proposals that were in more environmentally sensitive areas, and Metro dropped some of its initial proposals as potentially too damaging. But truth be told, we reached these results not because of rigorous analysis, but largely as a result of an emotionally fraught political process.

It would have been helpful to have had a cogent set of guidelines. I think the proposed Multnomah County Comprehensive Plan update shows considerable evidence that the CAC and county staff seriously considered the many complex issues of land use planning in our natural areas, and I congratulate everyone involved for a job well done. But improvement is always possible. I urge the Board of Commissioners to further improve the county's guidelines by adding the following language to the Comp Plan as **Strategy 8.8-1:**

**Strategy 8.8-1 Ensure that a higher level of scrutiny is given to recreational development in environmentally sensitive areas; the greater the environmental significance a natural area has, the more important it is to limit the scope of recreational development in that area.**

Thank you for your consideration of these suggestions.

Sincerely,

  
Jerry Grossnickle



Rithy KHUT &lt;rithy.khut@multco.us&gt;

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**Fwd: Comment re: Multnomah County Comprehensive Plan, Draft 2016**

1 message

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Rich FAITH <rich.faith@multco.us>  
To: Rithy Khut <rithy.khut@multco.us>

Wed, Aug 24, 2016 at 7:38 AM

----- Forwarded message -----

From: Cindy Reid <cinbah@spiritone.com>  
Date: Tue, Aug 23, 2016 at 4:07 PM  
Subject: Comment re: Multnomah County Comprehensive Plan, Draft 2016  
To: Deborah Kafoury <mult.chair@multco.us>, Bailey Jules <district1@multco.us>, Loretta Smith <district2@multco.us>, Judy Shiprack <district3@multco.us>, Diane McKeel <district4@multco.us>  
Cc: Adam BARBER <adam.t.barber@multco.us>, Rich FAITH <rich.faith@multco.us>

Dear Chair Kafoury and Commissioners:

I appreciate the opportunity to comment on the adoption of the Multnomah County Comprehensive Plan, Draft 2016. Overall, it is a testament to hundreds (maybe thousands) of hours of collective efforts by community members, Community Advisory Committees, Technical Advisory Committees, the County Planning staff, the Planning Commission, and each of you and your staff members. I hope everyone is proud of the work presented here.

There are a few areas of the document that continue to concern me. as a resident of Sauvie Island. I believe most of these concerns have been stated in several venues:

1) See 1-22, last paragraph - "However with respect to all questions of interpretation of this Plan, the provisions of the Plan control over the provisions of the now repealed SIMC appended to this plan". It seems that all the work that went into the SIMC RAP, which included highly specific language and revisions - should not in fact be repealed - but used in conjunction with the Comprehensive Plan - and that specific SIMC sub area plan language should control the interpretation if there are conflicts, or if the specific sub area language is more stringent.

I cannot speak to the plans of the other sub areas - or had the time to read each of those plans.

2) Finally, the sections re: Code Compliance 2.41-1 through 2.41-4 - The policies suggested for Code Compliance continue to put the onus of reporting Code Compliance violations on neighbors suffering the consequences of unpermitted structures and unpermitted uses. The County proposes to marshal its resources to assist the non-compliant, which can and does result in structures that should have never been built, creatively adapted so that they are compliant. Non-compliant use of those structures remains an on-going issue and these policies do not create incentives to discourage non-compliant buildings or non-compliant uses. They instead create incentives to hope you don't get caught - and create on-going challenging conditions for the adjacent property owners who support and value land use planning, zoning, code and protections to either "bear with" the violations or "report" their neighbors, and endure consequences either way.

I would like the Board of County Commissioners to require that this section be re-conceived and re-written to support the compliant landowners and those who value land use planning, and require County Planning to take a stronger pro-active educational and enforcement role, and pass the costs of actual enforcement onto the non-compliant landowners. The costs to the adjacent landowners of enduring and then reporting these issues go far beyond financial costs - they are time-consuming and have an incalculable emotional toll.

Thank you for all of your good work. I regret missing the Board meeting on Thursday.

Sincerely,  
Cindy Reid  
Sauvie Island Resident

PO Box 83731



Rithy KHUT &lt;rithy.khut@multco.us&gt;

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**Fwd: Possible revisions to the draft Transportation System Plan**

1 message

Rich FAITH &lt;rich.faith@multco.us&gt;

Wed, Aug 24, 2016 at 7:48 AM

To: Michael Cerbone &lt;michael.cerbone@multco.us&gt;, Rithy Khut &lt;rithy.khut@multco.us&gt;

----- Forwarded message -----

From: Andrew Holtz &lt;holtzreport@juno.com&gt;

Date: Tue, Aug 23, 2016 at 5:14 PM

Subject: Possible revisions to the draft Transportation System Plan

To: [mult.chair@multco.us](mailto:mult.chair@multco.us), [district1@multco.us](mailto:district1@multco.us), [district2@multco.us](mailto:district2@multco.us), [district3@multco.us](mailto:district3@multco.us), [district4@multco.us](mailto:district4@multco.us)Cc: Joanna VALENCIA <[joanna.valencia@multco.us](mailto:joanna.valencia@multco.us)>, Rich Faith <[rich.faith@multco.us](mailto:rich.faith@multco.us)>, [kevin.c.cook@multco.us](mailto:kevin.c.cook@multco.us)

Dear Chair Kafoury and Commissioners,

I served on the Community Advisory Committee to the Multnomah County Comprehensive Plan and Transportation System Plan Update.

A fundamental principle of our deliberations, supported by input from other members of the community, is that the rural areas of the county are special treasures that provide incalculable benefits to everyone in our county and the region. One key component of preserving these areas and maintaining the benefits is to continue to manage rural area roads for their intended purpose: to provide access to and from the rural areas.

There is relentless pressure on too many of these roads, particularly in the west hills. There are strong demands surrender these roads to be used for regional driving trips. But that would mean surrendering the rural areas themselves, a loss to not only the wildlife and residents of the rural areas, but to everyone in our county and region.

Even though every transportation planner knows that building more road capacity feeds demand, there are those in Washington County, Columbia County and elsewhere who see widening Multnomah County's rural roads as a quick response to the complaints of their residents who drive across the west hills... not to or from the rural area, but through it. Surrendering to these demands would not only fail to ultimately solve the problem (because increased capacity would simply induce greater demand), it would undercut the motivation to develop multi-pronged, regional responses that include transit, as well as planning and development that provide jobs and services closer to where people live, so that they don't need to cross the west hills to get what they want.

Note: there is no bus service along Cornelius Pass Road or Cornell Road or other popular commuting routes, despite the obvious demand. Imagine how much less incentive there would be to establish transit options if the road capacity for single occupancy vehicles were increased.

8/24/2016

Multnomah County Mail - Fwd: Possible revisions to the draft Transportation System Plan

The Comprehensive Plan and Transportation System Plan should hold fast to the long-standing policy to maintain rural roads in order to provide access to and from the rural areas, not as regional traffic routes. Specifically, policies 11 and 12 of the Transportation System Plan should not be weakened in a way that allows rural areas (and the benefits they provide us all) to be sacrificed to the demands of drivers whose trips neither start nor end in the rural areas.

Sincerely,

Andrew Holtz

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Rithy KHUT &lt;rithy.khut@multco.us&gt;

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**Fwd: 2016 County Plan Draft Testimony**

1 message

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Rich FAITH <rich.faith@multco.us>  
To: Rithy Khut <rithy.khut@multco.us>

Wed, Aug 24, 2016 at 2:17 PM

----- Forwarded message -----

From: Ruth Metz &lt;ruthmetz@spiretech.com&gt;

Date: Wed, Aug 24, 2016 at 1:30 PM

Subject: 2016 County Plan Draft Testimony

To: Chair &lt;mult.chair@multco.us&gt;

Cc: District 1 &lt;district1@multco.us&gt;, District 2 &lt;district2@multco.us&gt;, district4@multco.us, dans@multco.us

Dear Chair Kafoury:

I appreciate the opportunity to comment on the adoption of the Multnomah County Comprehensive Plan, Draft 2016. I am sending this in advance in case I am not able to be present as I hope to be at tomorrow's meeting.

While I appreciate the efforts of the many people that developed the plan, I am extremely concerned about two aspects it. First, I am very concerned that proposed changes in the wording of the plan will weaken the integrity of the plan as it affects subareas. For example, in 1-22, last paragraph - "However with respect to all questions of interpretation of this Plan, the provisions of the Plan control over the provisions of the now repealed SIMC appended to this plan".

The possibility of the diminution of the subarea plans was presaged at the end of the SIMC subarea planning. At that time, citizens insisted before Multnomah County Planning officials and the Planning Commission that sub area plans should not be weakened by a County Plan. My recollection is that citizens, County representatives, and Planning Commissioners were on the same page about this at the time.

The subarea plans which are the result of detailed study and knowledge of the subareas, should inform questions of interpretation and should control decisions.

My second concern has to do with Code Compliance 2.41-1 through 2.41-4. These draft policies put the responsibility of compliance on neighbors who are expected to report suspected code violations. If the County's position on code violations brought to the County's attention continues to be to assuage the non-compliant, to look the other way, to stretch compliance, Sauvie Island will continue to build up with non-compliant structures that fly in the face of the Plan's intentions and goals. Further, the County will discourage the cooperation of residents that experience the effects of violations first hand. The passive treatment of code violations is insincere and provokes citizen resentment of County government. I don't know precisely what must happen for County officials to be able to effectively address code violations—authority, clarity, willingness, know-how, training, coaching—but this is the question I respectfully put before you on this matter.

In conclusion, I share the position raised by others that where a subarea plan like the SIMC plan is either more stringent or in conflict with a countywide plan, the subarea plan language will control. I urge you to deny any changes in the language that diminish or weaken the intentions that led to the SIMC Plan. I encourage you to strengthen the County's responsible follow-through on code enforcement.

Sincerely,

Ruth Metz

17335 NW Lucy Reeder Road

Portland, OR 97231