



Rithy KHUT <rithy.khut@multco.us>

Fwd: Draft Comprehensive Plan

1 message

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

Thu, Aug 18, 2016 at 2:58 PM

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

From: **Kelsey Cardwell** <kelseyc@nw-trail.org>

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

Subject: Draft Comprehensive Plan

To: mult.chair@multco.us, district1@multco.us, district2@multco.us, district3@multco.us, 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.



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

August 19th, 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 5th 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 26th, 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. 3rd (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

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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.

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

¹ 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.” 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.

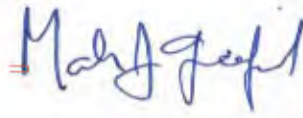
“Where policies specific to individual subareas are more stringent or conflict with policies applicable countywide, the subarea policies control.”

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.

² The Oxford dictionary defines “undue” as “unwarranted or inappropriate because excessive or disproportionate.” This too is a reasonable definition.

Thank you for your consideration of and attention to these important issues.³

Very truly yours,



Mark J. Greenfield

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

³ Copies of definitions taken off the internet are attached.

- [\(:.\\IES](#)
- [- THE SAURUS](#)
- [- WORD OF THE DAY](#)
- [VIUF.O](#)
- [WORDS AT PLAY](#)
- [FAVORITES](#)



- Dictionary
- Thesaurus
- Scrabble
- Spanish Central
- Learner's Dictionary

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- FAVORITES

\$39

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 — M...

Source: Merriam-Webster's Learner's Dictionary

- Metro ignored this

(tit)

Page 1 of 10

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

} More used
- there
is said

complementarily

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complementary

110u111

See complementary defined for English-language learners

See complementary defined for kids

Examples of *complementmy* in a sentence

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rl2 cro 10:r,r y,t fltl (.v u~l
ZR.WM t~ -r,t-< ~ MG
f(~r].

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, *At Jamie*, January 1990
3. Vann and Ells berg were the odd couple, di f'ficult men from di f'fercnt worlds satisfying *complemllettar*' needs in each other. -N f-i I Sheehan, *A Bri-ht Shilling l.ie*. 1988
4. ... it was becoming more and more clear to him that tv! iss Bart herself possessed precisely the *Clllllplemellitary* qualities needed to round off his social personality. -Edith Wharton, *Tik<' Hou.le of Mirth*, 1905
5. She wore a new outfit with a *complemelltary* scarf.
6. My spouse and I have *complementllry* goals.



Enter your last name to find out
ancestry.com/Last-Names

Origin and Etymology of *complementary*

(sec complement)

Fi rst Known Use: 1829

Related to *complementmy*

Synonyms

correlative, reciprocal, supplemental, supplementary

Antonym(s)

- at function as complements of/. 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 him in *he is mad*) or the object (as mad in *he drove her mad* or him 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 and cause of complement antibodies
- Red blood cells pre complement on the red cells.
- Get more examples

COMPLEMENT

verb

Pronunciation: /'kɒmplɪmənt/

[with object]

!Contribute extra features to (someone or something) in such a way as to improve or emphasize their qualities: a classic book complements a look that's modern or contemporary

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.

examples

off,

harmonize with, be the perfect companion to, be the perfect the final touch to, add to, supplement, augment, enhance, complete

synonyms

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

More example sentences

- The Nubira complements the
- Bosses at Pizza Pioneer, who day to complement its already buoyant evening business.
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- FAVORITES



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- Dictionary
- Thesaurus
- Scrabble
- Spanish Central
- Learner's Dictionary

consistent

An Encyclopedia Britannica Company

- GAMES
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- WCJRDS.11" PL.11"
- I-AVORILES

Follow:



consistent

pJL¹.
adjeclil'e con·sis·tent \kon-'sis-tont\
 Popularity: Top 10% of words

Simple Definition of *consistent*

- : 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 ▼

- •
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• Cite2

Full Definition of *consistent*

1. **consistent** : possessing firmness or coherence
2. **consistent** : marked by **harmony, regularity, or steady continuity** : free from variation or contradiction <a consistent file in pointing> h: marked by agreement: **compatible** — usually used with **with** <I'm consistent with the mill> c: showing steady conformity to **character, profession, belief** or custom <a consistent patriot>
3. **consistent** : tending to be **accurately** close to the true value of the parameter estimated as the sample becomes large <a consistent estimator>

consistently

12/11/16 Hcl advert>

Sec **consistent** defined for English-language learners

Sec **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, *The Quiet American 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. —Madeleine L'Engle, *A Wrinkle in Time*, (1962) 1976

5.

6.

1.

1.

11.

Origin and Etymology of *consistent*

Latin *consistent-*, *consistens*, present participle of *consistere* (see *consist*), *consistere* (sec. 1c., n. 1)

First Known Use: 1638

Related to *consistent*

Synonyms

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

Antonyms

- CIA:\I" S
- THE SAURUS
- WOHD 01' THE DAY
- VIOI:o
- \V(R DS f\T I'LA Y
- F.~\\'(1)ITFS



Dictionary

- compatible**

- GAMES
- THFS.\t\InIS
- \V\1\11C11-TI-TEL.\'Y
- WI
- WORN:-> AT I'I,AY
- FAVOURITES

||||~
(|jective com-pat i' ble \bm-'pa-to-b|I\
Popularity: Top 40% of words

- : able to exist together without trouble or conflict : going together well
- of devices and especially computers : able to be used together

Examples: compatible in a sentence▼

• —
• —
• —
• —
• —

Fig. 10.16

- 1: 1: **capable of** existing together in harmony <compatible theories> <compatible people>
- 2: 2: **capable of** cross-fertilizing freely or uniting vgcct.~tively
- 3: 3: **capable of** forming a homogeneous mixture that neither separates nor is altered by chemical interaction
- 4: 4: **capable of** being used in transfusion or grafting without immunological reaction (as agglutination or tissue rejection)

weaker than "complementary"

Other meanings that
Mazro
did not
mention

Page 2 of 9

Follow :

- CIL\AII'S
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Menu

Dictionary

- Dictionary
- Thesaurus
- Scrabble
- Spanish Central
- Learner's Dictionary

undue

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An Encyclopedia Britannica Company.

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- WORDS AT I'LAY
- FAVORITES

Follow:

undue

play.

adjectl-t-e un-tluc \-'dII, -'dyU\

Popularity: Bollom <10rm of words

Simple Definition of *undue*

- more than is _rca>onable or necessary

Source: Merriam-Webster's Learner's Dictionary

Examples: *undue* in a sentence▼

- -
- -
- -
- -
- -

Full Definition of *undue*

First context of policy: I
 I
 Metro ignored this

- 1. I : not due : not yet payable
- 2. 2: exceeding or violating propriety or fitness. *excessive* *ill-mannered*

Sec *undue* defined for English-language learners

Sec *Undue* defined for kids

Memo ~fV'?? ~ i -chese
in need

Examples of *undue* in a sentence

- 1. The~c requirements shouldn't cause you any undue hardship.
- 2. His writing is elegant without calling undr"" attention to itself.

- these fit =). definit WN --z6`7 fi-zJ
twe compare it
the rol'"/



14th Century

First Known Use of *undue*

14th century

Related to *undue*

Synonyms

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Au tOll) ~o

middling, moderate, modest, reasonable, temperate

lhlnl,d Word~

L~U...E'£, L'lldks", i~llllllt~suf~dL, ill finite. ~mi tlcss; unhcarahl; !!DjuLi fiahk, till\~tr;u\<d; illllD.Jh.T. inappropriatr. click, dills~tllll!.. !!nGJr~h~cd

\V~r, \nO~lll<;

deficient, inadequate, insufficient; minimal, minimum

Rhymes with *undue*

actue, achou, adieu, ado, Agnew, aarl'al\\*, airt~<1\; [ ~ ~~~~~ habu, Baku, bambou, hillyu, b~tituc.llil. !.i. hctlc11, hc'h""", bestrew, liiC'!!! hno-hn11, bouhou, lT~tnd~ld'll, ht~akthruugl. iw.rg~.L~achou, can~dn,l~HJfh', Gtutllchlluc, (i!J.J.: ( Pht, Ch't>llj!!, construc. ('nrlr, l"trkr,cre\), ~)Jll .[!].t~eckllll, curfew. ~ ~ Lkpcw, dno~tkH'. ill.t~nduc. Db.llt:- \V:lJ~n, floor-through, (ondill', !"Drp, Cjan~u. Ct.'ntOc), Li.. ~g!..li!,. G \_!).. ground (lTW. ~nmshclt', gu~u,lli! iJl.il, hereto, lli.nfJJ, home: brl;\, .Ll.wJ.i, horseshoe, how~to, Ll \_), Jhil . igll!, i.nJ.!!l, imbuc, R), jackscrew, 1-2, Fansu, b.!!J.'!>, K~troo, kazeu. 1~lw!u. kilgji!, Kwan~J!!l, lead~CIT\, lvan~t<>, lil g l~T, make~do, Matthew, U.L.L., 11 lildeN, 11 lileu, miscue, misdo, 11!!!W1, nu ~U, ~. o lte~tw'o, nu 'ic'\ , Putdo, p~du, Peru, (JDil., JI, p~vieu, p~sue, purt icll', ragout, redo, renew, Renfrew, mil~ll: n:t uc. LWJ~i~Je'. run-through, \andsht!!', Sitrd(!!!, ~. g1. !. set~to, ~t'screw, shampoo, ~ill'\', ~lidl.on. snafu, VJO\ sil'!!'. soft~shoe, span~new, ~ubJuc. :il.!!LIJ, tahn11, fug!!', tattit~o. 11 \.il . thcl'l'll, thumbscrew, 1~l~dn, tno~l"" tr~c shrew, undo. l!Dgll. unscrew, untruc. 131U, \en~ue, 1 CllicC, Drl.u \_ 1 noJoll, 11~ahnn, \alk~through, 11 hec~thruugl, 11 hcre~ttJ, k\_ ~ ~ \V~rdth icll', 1~aon, \.T lli1

Law Dictionary

undue

play.

# adjective

U p *this figure did not give rise to undue concern*

More example sentences

*first concern of policy*

- 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

## 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

## For editors and proofreaders

Line breaks: un:due

## Definition of undue in:

- US English dictionary
- English synonyms
- US English synonyms

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## What do you find interesting about this word or phrase?

Comments that don't adhere to our \_\_\_\_\_ Guidelines may be moderated or removed.



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

---

**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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Mark J. Greenfield  
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Portland, Oregon 97231  
(503) 227-2979  
[markgreenfield@involved.com](mailto: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.faith@multco.us>  
To: Rithy Khut <rithy.khut@multco.us>

Mon, Aug 22, 2016 at 8:08 AM

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

From: **Ron Eber** <ronaldeber@comcast.net>

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

Subject: Re: Proposed Comprehensive Plan

To: "Mark J. Greenfield" <markgreenfield@involved.com>, Commissioner Jules Bailey <jules.bailey@multco.us>, Kafoury Deborah <deborah.kafoury@co.multnomah.or.us>, district2@multco.us, district3@multco.us

Cc: Multnomah County Planning Planning County <adam.t.barber@multco.us>, Multnomah County Planning Planning County <michael.cerbone@multco.us>, andy.shaw@oregonmetro.gov, Tomkins Jed <jed.tomkins@multco.us>

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;

---

## Fwd: Proposed Comprehensive Plan

---

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

Mon, Aug 22, 2016 at 8:08 AM

Forwarded message

From: Ron Eber <ronaldeber@comcast.net>  
Date: Sun, Aug 21, 2016 at 1:08 PM  
Subject: Re: Proposed Comprehensive Plan  
To: "Mark J. Greenfield" <markgreenfield@involved.com>, Commissioner Jules Bailey <jules.bailey@multco.us>, Kafoury Deborah <deborah.kafoury@co.multnomah.or.us>, district2@multco.us, district3@multco.us  
Cc: Multnomah County Planning Planning County <adam.t.barber@multco.us>, Multnomah County Planning Planning County <michael.cerbone@multco.us>, andy.shaw@oregonmetro.gov, Tomkins Jed <jed.tomkins@multco.us>

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: Proposed Comprehensive Plan

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

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**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



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

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[district1@multco.us](mailto:district1@multco.us)  
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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.

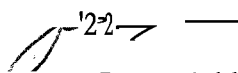
A further common-sense refinement could be that the Comp Plan explicitly state that **the greater the environmental significance a natural area has, the greater the scrutiny a recreational development in that area should have.** This analytical framework would have helped Metro's North Tualatin Mountains 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,

  
erry Grossnickle



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

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

1 message

**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;

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

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 To: Rithy Khut <rithy.khut@multco.us>

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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.

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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6901 SE Oaks Park Way, #18

Portland, OR 97202

Office: [503-292-1699](tel:503-292-1699)

Cell: [503-358-3424](tel:503-358-3424)

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*Rich Faith, AICP*

Multnomah County Land Use Planning Division

1600 SE 190th Avenue

Portland, Oregon 97233

[503-988-3931](tel:503-988-3931) (Direct)

[503-988-3389](tel:503-988-3389) (FAX)

[rich.faith@multco.us](mailto:rich.faith@multco.us)



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

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**Fwd: 2016 County Plan Draft Testimony**

1 message

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

Wed, Aug 24, 2016 at 2:17 PM

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From: **Ruth Metz** <ruthmetz@spiretech.com>  
Date: Wed, Aug 24, 2016 at 1:30 PM  
Subject: 2016 County Plan Draft Testimony  
To: Chair <mult.chair@multco.us>  
Cc: District 1 <district1@multco.us>, District 2 <district2@multco.us>, 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



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

## Fwd: 2016 County Plan Draft Testimony

1 message

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

Wed, Aug 24, 2016 at 2:17 PM

Forwarded message

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 Date: Wed, Aug 24, 2016 at 1:30 PM  
 Subject: 2016 County Plan Draft Testimony  
 To: Chair <mult.chair@multco.us>  
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Portland, OR 97231

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## Fwd: Multnomah County View Overlay West Hills Area

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

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

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

Fri, Aug 12, 2016 at 2:05 PM

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

From: April Gutierrez &lt;april@pnwtax.com&gt;

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@emiworldwide.com](mailto:tim.lagasse@emiworldwide.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 &lt;rithy.khut@multco.us&gt;

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## Fwd: METRO COMMENTS - Draft Comprehensive Plan Updates

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<[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 <[coet@pacssi.com](mailto:coet@pacssi.com)>, Bethel Webber <[bethwebber@earthlink.net](mailto:bethwebber@earthlink.net)>

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

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

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1 message

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

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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

---

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

Fri, Aug 12, 2016 at 6:23 PM

SECIV 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;

---

**Fwd: Comprehensive Plan Updates**

**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;

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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