

August 19, 2016

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

Subject: Update to Multnomah County Comprehensive Plan

Dear Chair Kafoury and Commissioners:

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Multnomah County Board of Commissioners

August 19, 2016

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

Very truly yours,



Mark J. Greenfield

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

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

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Follow:



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complementary

<sup>/</sup>  
 adjecti••e com-plc-mcn-ta-ry \kiim-pij-'men-t(~-)rc\  
 Popularity: Top 10% of words

### Simple Definition of **complementary**

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

- Metro ignored this

Source: Merriam-Webster's Learner's Dictionary

Examples: *complementary* in a sentence

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Full Definition of *complementary*

1. **1** : relating to or constituting one of a pair of contrasting colors that produce a neutral color when combined in suitable proportions
2. **2** : serving to fill out or complete
3. **3** : mutually supplying each other's lack
4. **4** : being complements of each other (see <sup>1</sup>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

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### complementarily

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### complementary

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See complementary, defined for English-language learners

See complementary, defined for kids

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### Examples of *complementary* in a sentence

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*, *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 Ellsberg were the odd couple, difficult men from different worlds satisfying *complementary* needs in each other. -Nancy I Sheehan, *A Bright Shilling*, 1988
4. ... it was becoming more and more clear to him that even Bart himself possessed precisely the *complementary* qualities needed to round off his social personality. -Edith Wharton, *The House of Mirth*, 1905
5. She wore a new outfit with a *complementary* scarf.
6. My spouse and I have *complementary* goals.



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### Origin and Etymology of *complementary*

(see <sup>1</sup>complement)

First Known Use: 1829

### Related to *complementary*

#### Synonyms

correlative, reciprocal, supplemental, supplementary

Antonyms:

- 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 mad in *he is mad*) or the object (as mad in *he drove her mad* or Wagner 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 of antibodies complement and cause cell lysis.
- Red blood cells complement 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 complements a look that's or or

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.
- ] \_\_\_\_\_ to \_\_\_\_\_ will

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Dictionary

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

consistent

An Encyclopedia Britannica Company

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Follow:

consistent

*ˈkɒn.sɪ.s tənt*  
*adjective* con·sis·tent (kon·sis·tənt)  
 Popularity: Top 10% of words

Simple Definition of *consistent*

— PLANNING COMMISSION'S TERM

- 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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- Cite!

Full Definition of *consistent*

- 1. **archaic** : possessing firmness or coherence
- 2. **marked by harmony, regularity, or steady continuity** : free from variation or contradiction <a co|J|S|en|f|l|f|y|e| |n|p|o|i|n|g> .h: marked by agreement: compatible -- usually used with with <|t|<|t|e|n|e|i|l|l|u|l| c|o|n|l|s|e|n|t|l|v|l|h| |h|e| |m|l|l|> c: showing steady conformity to character, profession, belief or custom <a c|o|n|s|e|n|t|e|/|p|a|t|r|o|t|>
- 3. **tending to be arbitrarily**, close to the true value of the parameter estimated as the sample becomes large <a <O|l|l|S|e|n|t| |N|u|l|l|f|i|> a| e|l|l|m|a|t|o|r|>

## consistently

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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 the Writer*, edited by Ann Charters. 1987
- 3. One of the strengths of Blake's letters is their *consistent* readability. -William Styron, *The Quiet Drum 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. \_\_\_\_\_

## Origin and Etymology of *consistent*

Latin *consistens*, *consistens*, present participle of *consistere* (see *consist*), *consistens*

First Known Use: 1638

## Related to *consistent*

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

Antonyms: <http://www.merriam-webster.com/dictionary/consistent>



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

## compatibility

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## compatible

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## compatibleness

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## compatibly

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Sec [compatible](#) de\1ncd for English-language learners

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## Examples of *compatible* in a sentence

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

Enter your last name to find out.

## Origin and Etymology of *compatible*

Middle English. from Medieval Latin *compatibilis*, literally, sympathetic, from Late Latin *compsti*

First Known Use: 15th century

## Related to *compatible*

Synonyms

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

Antonyms

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

Related Words

[pacifist](#), [peaceable](#), [peaceful](#); [collaborating](#), [cooperative](#), [synergistic](#), [synergic](#); [noncompetitive](#), [nonconflicting](#), [uncompetitive](#); [sympathetic](#), [tolerant](#), [understanding](#); [friendly](#), [amicable](#), [cordial](#), [friendly](#), [genial](#), [cordial](#)

Antonyms

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

## Rhymes with *compatible*



- 1. I: not due : not yet payable
- 2. 2: exceeding or violating propriety or fitness: excessive <lllllllr fnn-e>

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Sec undue: defined for English-language learners

Sec Undue defined for kids

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.

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14th Century

First Known Use of *undue*

14th century

Related to *undue*

Synonyms

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deficient, inadequate, insufficient; minimal, minimum

Rhymes with *undue*

accrue, achou, adieu, ado, Agnew, aarl'at\\*, airsc'<!\; [ ~ -; """""" : habu, Baku, bamboo, hllu, b:tituc.llil'.i. hctcl1, hc'h""", bestrew, liC'!!! hno-hnll, bouboy, ll:rnd-ld'll, ht-akthroughil, iw.rg~.L-achou, can-dn,l:HJfh', Gtutllchlluc, (i1J.J: ( rht, Ch't>llj!!, construc. (nrir, l"trkr,cre\, ~)Jll . [l].t-eckllll, curfew, ~ - Depew, dno-tkH'. ill:t-nduc. Db.ll:- \l:lJ-n, floor-through, (ondtll', "DrdP, Cian~u. Ct.'ntOc), Li. ~g!.li!, G\_!). ground ("TW. ~nmshclt', gu~lli' i11.il, hereto, li.nfJJ, home brl:\, .ll.wJ.i, horseshoe, how-to, Ll\_(), Jil . igll!, i.nJ.!!l, imbue, IQ, jackscrew, 1-2, Fansu, b.J.'!>, K:troo, kazoo, 1-lw'u, kitgji!, Kwan~J!!, lead\CIT'\, lvan-t<>, lil g 1 [t'IT', make-do, Matthew, J.I.L., 11 Hilde!, 11 ilieu, miscue, misde, 11!!W1, nu -U, ~. o lte-tw'o, nu 'ic'\, Putdo, perdu, Peru, (JDi., JI, preview, pursue, pur icll', ragout, redo, renew, Rentrew, mil-11: n:t uc. LWJ~ii-\Je'. run-through, landsht!l', Sitrdlll, ~. g1. !. set-to, ~t'screw, shampoo, ~ill'\, ~lidlon. snafu, WJO\ sil'l'l'. soft-shoe, span-new, ~ubJuc. i!l!LJJ, tahn1, fug!!, tattt-o. 11 \.il . thcl'l'll, thumbscrew, l!l-dn, tno-l"". tr-c shrew, undo. l!Dgll. unscrew, untrue, 131U, \enduc, 1 CllliC, Drl.u. 1 noJoll, 14-ahn. \J'alk-through, 11 hec-throughl, 11 hcr-ttJ, lc ~ ~ -\l't>rlth icll', t'apon, \.1 Hll

Law Dictionary

undue

play

# adjective

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

*first concern of policy*

More example sentences

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

## 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:

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