

We urge a time extension of at least an additional 90 days for citizen comments and to allow the Bureau of Planning and Sustainability to further refine the Proposed Comprehensive Plan Draft.

The Draft proposed and major shift in focus from considering the interests of citizens to emphasizing those of the development, institutional, and employment communities.

The Draft eliminates the current Comprehensive Plan policies (Goal 3, Goal 9 and Goal 10. 9 and 10) governing the role of Neighborhood Associations and the need for the Office of Neighborhood Involvement. It does not include an alternative for citizen involvement as required by State Wide Goal 4.

The Draft's economic chapter is incomplete.

The "IC" Zone as proposed would encourage businesses which could compete unfairly with off campus business required to pay taxes. It would also not replace the taxes that they pay.

Mixed use zones would not be compatible with all neighborhoods around campuses as proposed.

Please take another look at the Statewide Planning Goals, The chart on page GP 1-10 of the Draft is inconsistent with State Requirements as set forth on page A-8.

ORS 195.110 requires Long Range Facility Plans for large school districts to be included in the Comprehensive Plan. PPS has completed theirs and David Douglas is in the process. ORS 197.768 requires public hearings for these plans. The Draft does not include them and there seems no other provision for such hearings.

The Draft does not include Resource Protection Plans. See goal 5 on page A-8.

The Draft does not include language concerning the relationship between infrastructure planning and "Orderly Land Development". Please take another look at the definitions for "Buildable Lands" & "Serviceability" (ORS 197 Appendix ,.300).

Dave and Dixie Johnston

0550 SW Palatine Hill
Portland, Oregon 97219.

David Johnston <dave_and_dixie@yahoo.com>