



7688 SW Capitol Hwy, Portland, OR 97219

March 13, 2015

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**Re: Reconsideration of Extension Request  
2035 Comprehensive Plan**

The Multnomah Neighborhood Association would like to thank Mr. Baugh for his response (attachment 1) to our request (attachment 2) to extend the comment period for the Draft 2035 Comprehensive Plan. We would like you to reconsider your decision so that we can evaluate the expected impacts on our neighborhood of the mixed-use designations after they are made public. The proposed Draft 2035 Comprehensive Plan policies related to the new zoning designations are too vague for us to evaluate the impacts and what should probably be included in the goals and policies has been moved to the implementation phase.

Properties in Multnomah with the vaguely defined mixed-use designations are slated to encompass up to 28% of the increased capacity in our neighborhood. For this reason, we feel it is necessary that we have the opportunity to testify on any concerns that these designations raise before the comment period is closed. A similar request for a time extension was submitted by SWNI on behalf of 17 neighborhood associations. Based on the discussion at the SWNI Board meeting, the SWNI request was due in large part to the uncertainty of the new land use designations for mixed-use and campus-institutional zoning. These concerns are widespread and should be given serious consideration.

In the response to our initial request, it was mentioned that the CIC discussed extension requests at the Nov. 18<sup>th</sup> PSC workshop and that the CIC did not endorse an extension. At the outset of his CIC testimony at the Nov. 18<sup>th</sup> PSC workshop, Stan Penkin specifically stated that the CIC was testifying to summarize observations, not to make recommendations. At the same workshop, Linda Nettekoven stated that she attributed people requesting more time to the overload of documents and important topics being simultaneously addressed. This is another reason that additional time is needed. We have submitted many requests for amendments and additions, and with more time, we would be able to more thoroughly review this important document. It is noteworthy, that Stan Penkin also testified that he was aware that Southeast had expressed a need for additional time.

The following excerpts from the minutes of the subsequent February 25, 2015 CIC meeting argue that the CIC recognized the need to extend the comment period:

*"Members discussed issues that have surfaced in Comprehensive Plan testimony about the public engagement element of the process. Most of the process-related testimony is related to the timing of the release of the draft components of the Comprehensive Plan (particularly the Task 5 projects), and CIC members agree that this has been a concern. Members articulated community concerns about being asked to "write a blank check" by having designations considered before zones.*

*CIC members expressed frustration with public engagement around the TSP; the concerns about a compressed timeline are particularly strong for this part of the Comprehensive Plan, because the material is very complex. Concern was also expressed about the perception of a lack of connection between transportation planning and land use planning."*

If additional time is being requested by the neighborhoods in Southeast as well as Southwest, then the CIC should analyze the merits of these requests in detail before making a formal recommendation. We are not asking for unlimited time, but have linked our request to the release of details that we consider crucial to our review of the Draft Comprehensive Plan. To our knowledge, the CIC did not review our letter or get an account of the scores of individuals, neighborhood associations, and neighborhood coalitions that have submitted extension requests to the record. They should be provided this information to inform their recommendation.

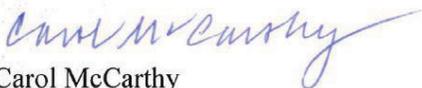
The BPS staff has been introducing new material for the Comprehensive Plan in staff reports that has not had any public review in PSC hearings or work sessions. The Provisional Center Boundaries maps were first seen by the public in a February 4, 2015 staff report to the PSC. If new material is added by staff, more hearings are required.

Based on informal discussions with the LCDC, we understand that the #1 Goal of citizen involvement is paramount. If the City were to discuss our request with the LCDC, we believe it would be seriously considered and likely granted. We hope that you will take the opportunity to demonstrate that citizen involvement means more than outreach. It requires that citizen feedback be heard to inform the process.

We were heartened by Mr. Baugh's comment "And the PSC is prepared to increase opportunities for review and testimony if necessary" and we are hopeful that this our second request will be given the detailed and thorough consideration that we believe it warrants.

Please add this to the record.

Thank you,



Carol McCarthy  
Multnomah Neighborhood  
Association Chair  
mnachair@gmail.com

cc: Anne Debbault, DLCD, Portland Regional Representative, [adebbault@dlcd.state.or.us](mailto:adebbault@dlcd.state.or.us)  
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November 14, 2014

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**Re: Request for PSC Timeline Changes**  
2035 Comprehensive Plan

The Multnomah Neighborhood Association requests that the Planning and Sustainability Commission change the timeline as shown in Figure 1. The timeline modifications allow citizens to comment on the **complete** 2035 Comprehensive Plan before it goes to City Council. This permits the citizens to comment on the adopted definitions from the Campus Institutional Project and the Mixed Use Zone Project before they are incorporated into the Comprehensive Plan. These changes, as shown in Figure 1, revise the City's timeline as follows:

- 1) Remove the PSC vote in March 2015.
- 2) Change the July 2015 City Council hearings on the Comprehensive Plan Goals and Polices to PSC hearings which allows citizens the chance to comment on revisions made by the PSC before the Goals and Policies are incorporated into the Comprehensive Plan.
- 3) The November 2015 City Council hearings would be changed to PSC hearings to allow citizens an opportunity to comment before the Comprehensive Plan and the Implementation Package move forward to City Council.
- 4) Reschedule the City Council hearings on the Comprehensive Plan and Implementation Package to February 2016.

The modified timeline would need to be slightly condensed to meet the December 31, 2015 deadline or an extension would need to be requested. Extending the deadline of Task 4 would require State approval from the DLCDD. It is our understanding that the DLCDD would grant these timeline changes and extension requests. The timeline changes would make the process to adopt the 2035 Comprehensive Plan consistent with the provisions of Goal 1 Citizen Involvement of the Oregon's Statewide Planning Goals and Policies OAR 660-015-0000(1).

Please add this to the record.

Thank you,

Carol McCarthy  
Multnomah Neighborhood  
Association Chair  
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cc: Anne Debbault, DLCDD, Portland Regional Representative, [adebbaut@dlcd.state.or.us](mailto:adebbaut@dlcd.state.or.us)  
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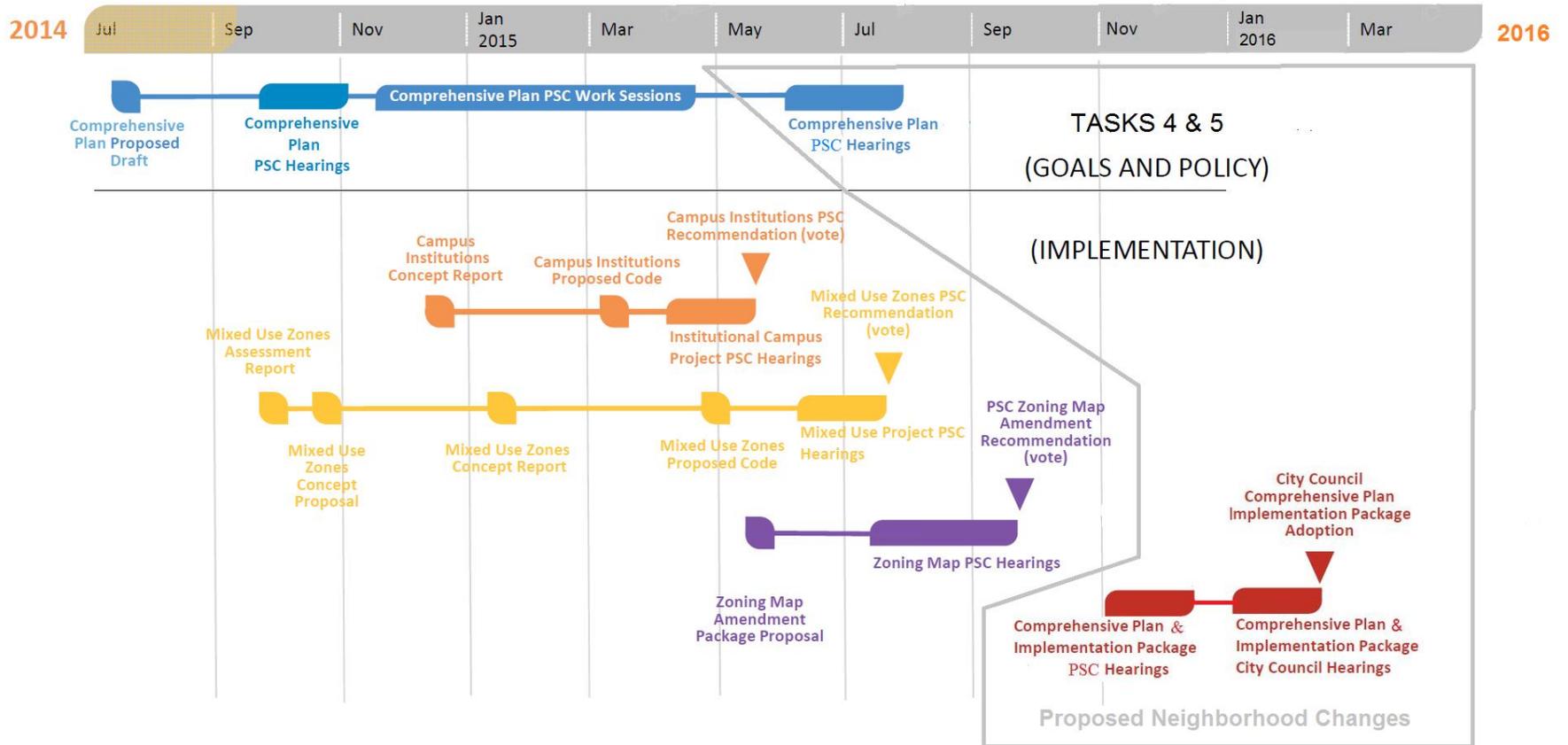


Figure 1 – Neighborhood Modified Timeline

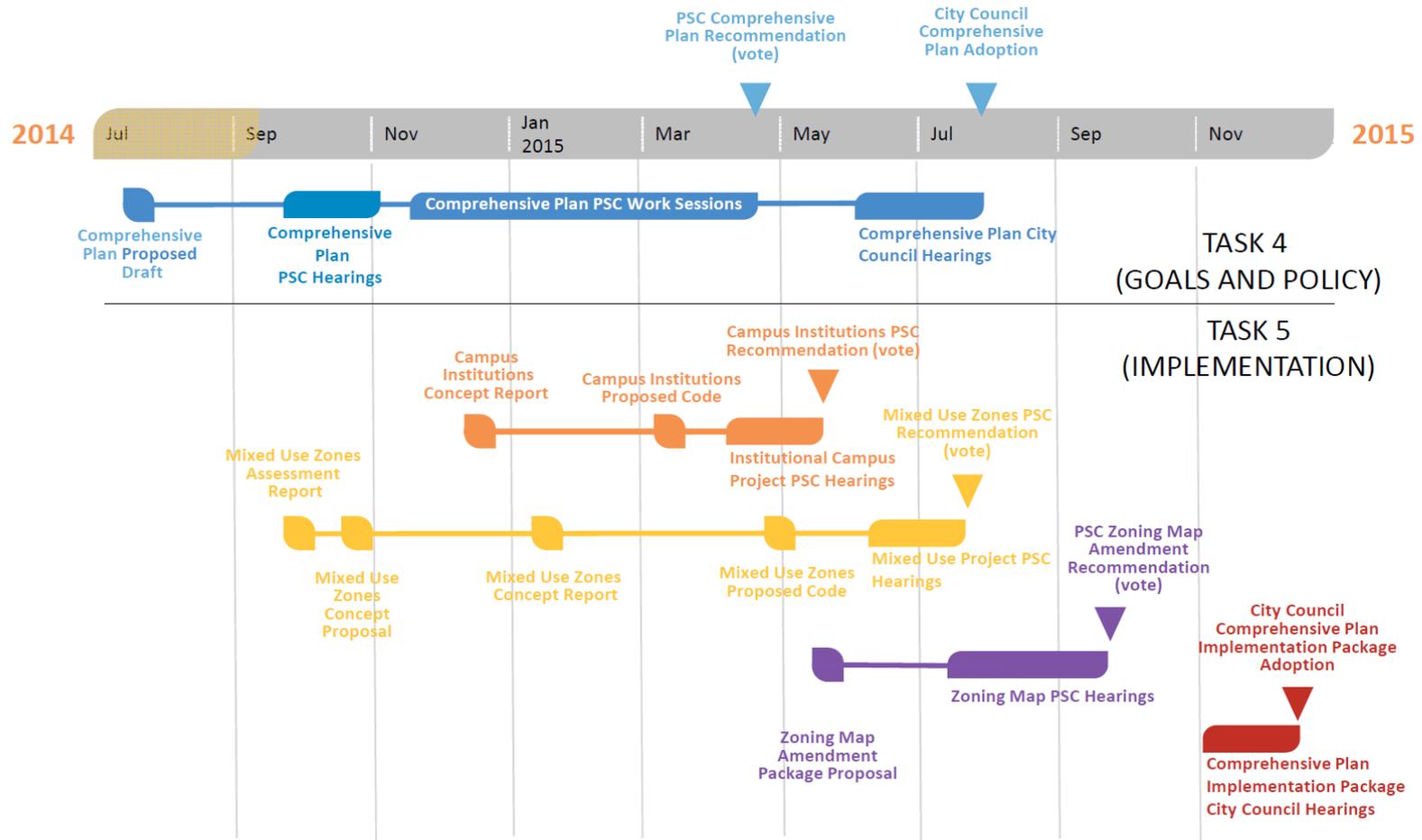


Figure 2 – Current PSC Timeline

11/21/14

Dear Carol and Multnomah Neighborhood:

Thank you for your comments below about the Comprehensive Plan Update and for expressing your concerns about the timeline for providing testimony at the Planning and Sustainability Commission. I wanted to respond to some of your concerns.

The PSC is the decision-maker as to when we close the record, and when we vote. On November 18, 2014, the PSC discussed our work session schedule and the most recent extension requests. We did not change the deadline; March 13, 2015 is still the deadline for written comments.

The Community Involvement Committee (CIC) is the citizen advisory committee that gives advice to BPS and the PSC on matters of public involvement. They also discussed the extension requests at Tuesday's meeting and did not recommend an extension. Members of the CIC gave a good overview of all of our public involvement work last night at the PSC. It is certainly worth watching – you can view the video online at <https://www.youtube.com/watch?v=LCowwMliz7U>.

The Comprehensive Plan will be sent to Council in two steps – policy and general land use diagrams and maps as the first action, implementation zoning details (zoning maps and codes) as the second action. I understand the Multnomah Neighborhood concern is primarily related to implementation – zoning code details related to the mixed use zones in particular. Initial concepts for the mixed use zoning are now available for public review at <https://www.portlandoregon.gov/bps/article/509414>.

Both steps will involve public hearings at the PSC and Council before anything goes into effect. There will be additional PSC hearings on the mixed use implementation details in late spring 2015. Nothing will go into effect until both steps have been approved by Council, and acknowledged by the state (probably 2016).

Additionally, in terms of a further extension at the PSC, there are state-imposed deadlines to complete this work in 2015, and we have already used up the allowed extensions. It is not unusual to break the decision into steps like this – other jurisdictions throughout the state and region do it this way. Policy and high level direction is typically established first, then we get into implementation details. If something about the implementation details causes us to re-think the broader policy, we can do that. It is iterative, and there are hearings all along the way. Additionally the PSC will not hesitate to re-open the broader policy or neighborhood center map designations if the code details and mapping reveal implementation problems.

And to be sure you understand our current timeline, the date you note in the below message for the PSC vote and recommendation (March 2015) is not correct; the anticipated PSC vote is planned in May 2015.

Going forward I feel comfortable citizens will have ample opportunities to testify in person and provide written testimony on policy and implementation of the Comp Plan. And the PSC is prepared to increase opportunities for review and testimony if necessary.

Thank you for expressing your concerns and I look forward to your continued involvement.

Sincerely,  
Andre Baugh  
Chair  
Portland Planning and Sustainability Commission