



Oregon

Kate Brown, Governor

Department of Land Conservation and Development

Community Services Division

Portland Metro Regional Solutions Center

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www.oregon.gov/LCD

September 2, 2016

Phil Nameny, City Planner, Project Manager
Portland Bureau of Planning and Sustainability
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201-5380

SENT VIA E-MAIL



Re: Proposed Plan Amendment - Mass Shelter and Housing Zoning Code Update (DLCD File No. PAPA 010-16)

Dear Phil,

Thank you for the opportunity to comment on the city's proposal to amend the city's zoning code to "...simplify regulations and improve flexibility for the siting of mass shelters and short term housing." The city is to be commended for its efforts to address affordable housing and the siting of shelters, however we do have concerns which are further outlined below. Please enter these comments into the record for this plan amendment and the proceedings of the September 13, 2016 Planning and Sustainability Commission hearing.

Oregon's Statewide Planning Goal 9: Economic Development,¹ states that comprehensive plans for urban areas shall (among other things): provide for at least an adequate supply of sites of suitable sizes, types, locations, and service levels for a variety of industrial and commercial uses consistent with plan policies; and limit uses on or near sites zoned for specific industrial and commercial uses to those which are compatible with proposed uses.

The city is proposing to allow larger mass shelters by right in Central Employment (EX) zones and to allow a mass shelter in General Employment (EG) zones through a conditional use review. The city should carefully evaluate its land supply and policy obligations under Goal 9 and Oregon Administrative Rules (OAR) chapter 660, division 9 for consistency with the adopted comprehensive plan.

Also, please note Oregon Revised Statute 197.610 (6)² if amendments are proposed following the Planning and Sustainability Commission hearing and recommendation:

¹ <http://www.oregon.gov/LCD/docs/goals/goal9.pdf>

² https://www.oregonlegislature.gov/bills_laws/ors/ors197.html

(6) If, after submitting the materials described in subsection (3) of this section, the proposed change is altered to such an extent that the materials submitted no longer reasonably describe the proposed change, the local government must notify the Department of Land Conservation and Development of the alterations to the proposed change and provide a summary of the alterations along with any alterations to the proposed text or map to the director at least 10 days before the final evidentiary hearing on the proposal. The director shall cause notice of the alterations to be given in the manner described in subsection (4) of this section. Circumstances requiring resubmission of a proposed change may include, but are not limited to, a change in the principal uses allowed under the proposed change or a significant change in the location at which the principal uses would be allowed, limited or prohibited.

Please contact me if you have further questions or concerns.

Best Regards,

A handwritten signature in cursive script that reads "Anne Debbaut". The signature is written in black ink and includes a long horizontal flourish extending to the right.

Anne Debbaut | Metro Regional Representative

cc: Susan Anderson, City of Portland (*email*)
Tom Armstrong, City of Portland (*email*)
Tom Hogue, Gordon Howard, Rob Hallyburton, DLCD (*email*)