



Oregon

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September 30, 2009



Sam Adams, Mayor
City of Portland
1221 S.W. 4th Avenue, Room 340
Portland, Oregon 97204

Periodic Review Work Program Approval Order 001773

Dear Mayor Christopher, Dear Mayor Adams, Chair Peterson,
Chair Wheeler, and Chair Brian,

I am pleased to inform you that the Department of Land Conservation and Development (DLCD) has approved the City of Portland's proposed work program for its comprehensive plan. Pursuant to state statute and agency administrative rule, we are issuing an approval order for Portland's periodic review work program.

Periodic review provides citizens, local governments, and state agencies an opportunity to focus on important community development planning with a specific end-date in mind. The City of Portland's periodic review work program calls for a cooperative effort between this agency and the city to address five tasks by October 1, 2012 related to the city's citizen involvement program, land use inventory and analysis, alternative patterns of needed housing and employment, policy choices, and implementation measures.

Periodic review is and will remain one of DLCD's top priorities. Approval of the periodic review work program lays out a framework for addressing needed planning work by the City. The specific details for individual work tasks are yet to be determined, but I have instructed our regional representative to work closely with city staff and with other interested parties to carry out the work program.

We appreciate the efforts of city officials and staff in preparing the work program and we look forward to working with you in updating Portland's comprehensive plan and land use regulations.

Darren Nichols is the DLCD staff person assigned for this effort. Darren will work closely with city staff on periodic review. Please feel free to call Darren at 503.373.0050 x255 or email him at darren.nichols@state.or.us if you have any questions or need further information.

Sincerely,



Richard Whitman
Director

Enclosure: DLCD Report and Order 001773
City of Portland Periodic Review Work Program

cc: Susan Anderson, City of Portland Planning Bureau Director
Mike McCallister, Clackamas Community Planning Manager
Karen Schilling, Multnomah Community Development Director
Brent Curtis, Washington County Planning Manager
Lynn Peterson, Chair, Clackamas County Board of Commissioners
Ted Wheeler, Chair Multnomah County Board of Commissioners
Tom Brian, Chair, Washington County Board of Commissioners
Mark Bartlett, Objector
Lynn Schore, Objector
Pat Wagner, Linnton Neighborhood Association, Objector
Larry French, DLCD Periodic Review Specialist
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Periodic Review Assistance Team (*email*)

DEPARTMENT OF LAND CONSERVATION AND DEVELOPMENT

ORDER AND REPORT ON RESPONSE TO OBJECTORS

(Mark Bartlett, Lynn Schore,
Linnton Neighborhood Association)

DLCD Order 001773

September 30, 2009

I. DECISION

Pursuant to Oregon Administrative Rules chapter 660, division 25, and based on the analysis and conclusions contained in this report, the Director rejects the objections of Mark Bartlett, Lynn Schore, and the Linnton Neighborhood Association to the City of Portland's Periodic Review Evaluation and Work Program, and approves the city's Periodic Review Evaluation and Work Program.

II. BACKGROUND – Summary of Timeline, Decisions, City's Submittal and Context

The City of Portland (City) received notice from the Department of Land Conservation and Development (DLCD) to initiate periodic review on November 13, 2007. Pursuant to OAR 660-025-0090(3), the City requested, and the director granted, a 90 day extension to its original completion date of May 12, 2008, in order to complete its evaluation and work program. On August 11, 2008, the City submitted to DLCD both the "Locally-Adopted Periodic Review Evaluation" and the "Locally-Adopted Periodic Review Work Program," that the City Council approved on August 6, 2008. Also, the Bureau of Planning (BOP) staff appeared before the State Citizen Involvement Advisory Committee (CIAC) at its August 21, 2008 meeting. Pursuant to ORS 197.160, the CIAC reviewed the City's proposed Committee for Citizen Involvement (CCI) and Citizen Involvement Program (CIP), Task I of its "Locally-Adopted Periodic Review Work Program." The CIAC provided recommendations for improvements to the work program for consistency with Goal 1.

The 21-day period for filing objections ended September 2, 2008. The Department received objections filed by three parties: Mark Bartlett, Lynn Schore, and the Linnton Neighborhood Association. The Department submitted its comments on the evaluation and work program to the City on September 9, 2008. On December 31, 2008, the City submitted a revised evaluation and work program and a revised CIP that conformed to the suggestions of the CIAC.

The City's periodic review process is not an isolated planning process; it is rooted in the larger context of the Portland Plan. The Portland Plan is a complete rewrite of the 1980 Comprehensive Plan and the 1988 Central City Plan. It combines elements of urban design, sustainability, and economically viable long-range planning. With a 30-year planning horizon, the Portland Plan is intended to guide the physical, economic, social, cultural, and environmental development of Portland.

ORS 197.628 and OAR 660-025-0010 describe the purposes of periodic review and establish the scope of the department's review. Both the statute and the rule specify that the purpose of periodic review is for comprehensive plans and land use regulations to remain in compliance with the statewide planning goals and to adequately provide for economic development, needed housing, transportation, public facilities and services, and urbanization. ORS 197.628(2) further specifies that the Land Conservation and Development Commission (LCDC) shall concentrate periodic review assistance on the statewide planning goals that pertain to economic development, needed housing, transportation, public facilities and services, and urbanization.

III. OBJECTIONS

A. The objectors are:

- a) Mark Bartlett,
 - 4 objections
- b) Lynn Schore,
 - 1 objection
- c) Linnton Neighborhood Association,
 - 1 objection

B. Criteria for valid objections:

Only persons who participated at the local level, orally or in writing, during the local process leading to the evaluation and work program or decision that no work program is necessary, may object to the City's decision. To be valid, an objection must:

“(a) Be in writing and filed with the department no later than 21 days from the date the notice was mailed by the local government;

“(b) Clearly identify an alleged deficiency in the evaluation, work program, or decision that no work program is necessary;

“(c) Suggest a specific work task that would resolve the deficiency;

“(d) Demonstrate that the objecting party participated at the local level orally or in writing during the local process.”

OAR 660-025-0100(2).

III. DLCD REVIEW

A. Mark Bartlett – Four Objections

Objection 1: No written Citizen Involvement Plan (CIP).

Summary: The Department understands Mr. Bartlett's first objection to be that the City does not have an adequate CIP, or that, to the extent there is a CIP, it was not shared with the public; that the City did not engage in a public involvement process prior to entering into Periodic Review, which fails to satisfy OAR 660-025-0080(2), which requires that there be an adequate process

for citizen involvement in “all phases” of the periodic review process; that involvement only started during the evaluation and work program phase (roughly November 2007 through August 2008); and that responses to his concerns by the City were inconsistent or deficient.

Objector’s Suggested Remedy: Before continuing the periodic review process, construct a written citizen involvement plan that is functional and understandable and provide that plan to the public.

Does the Objection Meet the Criteria for a Valid Objection: Yes; in part.

DLCD Response:

The City has an “acknowledged or otherwise approved” CIP.¹ For the purpose of periodic review, the City’s Public Engagement Strategy and the proposed Citizen Involvement Committee (CIC) will be the CIP as contemplated in Statewide Planning Goal 1. To the extent that the City previously had an inadequate CIP, Mr. Bartlett has not established that the City’s proposed Public Engagement Work Program submittal is inadequate and therefore has provided no basis for DLCD to sustain this aspect of his objection.

Mr. Bartlett is correct that there must be an adequate process for citizen involvement in all phases of the periodic review process, including the evaluation and work plan development phase. However, the objection does not establish how using the City’s existing CIP during that phase is inconsistent with OAR 660-025-0080(1). The objection does not establish that the CIP does not provide for citizen participation consistent with the minimum citizen involvement opportunities required by the periodic review rule. OAR 660-025-0080(2) requires that a local government review its CIP to assure that it is adequate for the periodic review process. Although that rule requires a local government to afford interested persons an opportunity to comment during the periodic review evaluation, the rule, read in its context, does not imply that the local government must conduct this review prior to entering into the evaluation and work program phase of periodic review. Therefore, the City acted consistently with both Goal 9 of its comprehensive plan and the rule by undertaking an evaluation of the CIP during the evaluation and work program development phase. The City states, and DLCD agrees, that it used its acknowledged CIP during the evaluation and work program phase.

As described by the City, at the outset of periodic review process, the City worked to design a new CIP specifically for plan updates. In January 2008, the public process for community involvement accelerated, when the City hired staff dedicated to the periodic review process. BOP staff constructed a Public Engagement Strategy with the help of other bureaus, the

¹ OAR 660-025-0080(1) requires in part that a local government use its “acknowledged or otherwise approved citizens’ involvement program to provide adequate participation opportunities for citizens and other interested persons in all phases of the local periodic review.” In its Evaluation, the City stated:

“Portland is required to use its existing state-approved citizen involvement program when beginning periodic review. This program is Goal 9 (Citizen Involvement) of our Comprehensive Plan. This goal is carried out, in part, by the ‘Legislative Procedures’ chapter of our zoning code. These provisions incorporate state public record and open meeting requirements, provide minimum 30-day notice of public hearings, and minimum 10-day availability of documents before a hearing. This 10-day document availability period falls short of a 21-day requirement for some stages described in the state periodic review rule (OAR 660-25).” Evaluation at 6.

Mayor's Office, and three public involvement consultants. The overall approach also included a strategic marketing communications program that built upon the 2007 visionPDX effort. Portland's Public Engagement Team developed a matrix of goals, outcomes, processes, and products for a series of eight community meetings, or "Listening Points," in May. These efforts culminated in the Portland Plan Leadership Summit, held June 6, 2008, and two Community Summits (designed to be more accessible to the public by being held on the weekend and designed as a grass roots effort), held Saturday, June 14. All told, nearly a hundred staff in eight bureaus² and more than six hundred members of the community came to these engagement activities to produce the Public Engagement Strategy.

With regard to the component of Mr. Bartlett's first objection that the City's responses to him were inconsistent or deficient, the suggested remedy does not address this alleged deficiency with a specific work program task. Therefore, the objection provides no basis for DLCD to find the City's submittal to be inadequate.

DLCD Conclusion: The valid portion of the first objection of Mr. Bartlett is rejected; the first objection of Mr. Bartlett in part does not comply with OAR 660-025-0100(2)(b) and is therefore not valid and as to that part, the Department must reject the objection pursuant to OAR 660-025-0100(3).

Objection 2: Failure of the BOP to include citizens in the process.

Summary: DLCD understands Mr. Bartlett's second objection to allege a violation of the participation requirement of Goal 2.³ The objection details that Mr. Bartlett petitioned the BOP to participate as early as autumn 2007, but was informed that he could not participate in or attend the policy and technical meetings of the BOP and that he requested minutes pursuant to ORS chapter 192 (Records; Reports and Meetings)⁴ but was told that none existed. The objection concludes that, "while the BOP may have met the very bare minimum according to the statutory requirements, these efforts were superficial, not meaningful."

Objector's Suggested Remedy: Considering that the written CIP is not yet ready to provide the public with a definition of their role in participating, extend the time for developing the work program.

Does the Objection Meet the Criteria for a Valid Objection: No

OAR 660-025-0100 provides that the remedy for resolving an alleged deficiency in the work program is a specific work task. OAR chapter 660, division 25 defines "work task" as "an activity, that

² Bureau of Development Services, Bureau of Environmental Services, Bureau of Housing and Community Development, Bureau of Planning, Office of Sustainable Development, Portland Development Commission, and Portland Department of Transportation.

³ Goal 2 provides in part:

"Opportunities shall be provided for review and comment by citizens and affected governmental units during preparation, review and revision of plans and implementation ordinances."

⁴ The Public Meetings Law requires that "[t]he governing body of a public body shall provide for the sound, video or digital recording or the taking of written minutes of all its meetings (emphasis added)." ORS 192.650. Because the Department determines that the second objection is not valid, it does not need to determine whether ORS 192.650, which applies to "the governing body", would be applicable to the BOP in the circumstance described in the second objection.

is included on an approved work program and that generally results in an adopted amendment to a comprehensive plan or land use regulation.” OAR 660-025-0020(8). The suggested remedy proposes additional time for the whole process of developing the work program. It is incongruous that the evaluation and development of a work program, which is comprised of work tasks, could be a discrete work task under the rule.

In addition, the proposed remedy is premised on the erroneous assertion that no CIP has existed throughout this process. As described under Mr. Bartlett’s first objection, the City relied on its acknowledged CIP during the evaluation and work program development. The role for public participation was clearly defined during this phase and is clearly defined going forward under Task I of the work program. Therefore, the suggested remedy would not resolve the alleged deficiency.

DLCD Conclusion: The second objection of Mr. Bartlett does not comply with OAR 660-025-0100(2)(c) and is therefore not valid and the Department must reject the objection pursuant to OAR 660-025-0100(3).

Objection 3: Failure to enumerate and disclose all projects to be incorporated under the Portland Plan.

Summary: In the third objection, Mr. Bartlett requests of the City “an enumeration of all work considered for inclusion under that comprehensive effort that comes to Council for a single vote called the Portland Plan.” He asserts that “these efforts are not inclusive of the public at this time in the way that the Goal and Statutes recommend or require.” DLCD understands the third objection to allege a deficiency in the evaluation and work program that results in a violation of the participation requirement of Goal 2.

Objector’s Suggested Remedy: The BOP must be directed to “define all projects underway that will impact or be incorporated into the final ‘plan’ being brought before Council for approval [and] [p]rovide publicly the names of staff and participants, meeting schedules, locations etc...so the public can actually participate in or follow intelligently these as they develop.”

Does the Objection Meet the Criteria for a Valid Objection: Yes.

DLCD Response:

The City submitted its “Locally-Adopted Periodic Review Work Program” that calls out five detailed work tasks. As noted, the periodic review work program is a subset of the work plan for the Portland Plan. Mr. Bartlett does not establish that all of the projects involved in the Portland Plan are or would be subject to the periodic review jurisdiction of the Department. The original and revised work programs (August 11, 2008 and December 31, 2008) contain all the required elements required by the periodic review statute.⁵

Any changes that the City makes to elements of the Portland Comprehensive Plan outside the scope of periodic review would need to be adopted as post-acknowledgement plan amendments rather than as periodic review work tasks. These amendments must comply with statewide planning goals and are subject to review for such compliance, including Goals 1 and 2. Also, the City indicates in its revised work plan that the new CIC may oversee the public

⁵ ORS 197.628(2) directs LCDC to “concentrate periodic review assistance to local governments on achieving compliance with those statewide land use planning laws and goals that address economic development, needed housing, transportation, public facilities and services and urbanization.”

involvement process for other Portland Plan components and, thus, be equally inclusive of the public as the periodic review amendments.

DLCD Conclusion: The third objection of Mr. Bartlett is valid, but it fails to demonstrate any violation of a statewide planning goal or rule. As a result, the Department rejects the objection.

Objection 4: Lack of public representation in the evaluation and work plan development and request for substitution of CIC members.

Summary: In the fourth objection, Mr. Bartlett asserts that the Portland Planning Commission has acted as the Goal 1 required Citizen Involvement Committee (CIC) since August of 2007 without authorization of DLCD or LCDC. He then objects to the new hybrid CIC, proposed in both the original and revised adopted work program, comprised of participants from the Planning Commission and the public.⁶ He asserts that this is “not truly representative of the OAR Goal [1].”

Objector’s Suggested Remedy: Portland instead should choose a representative citizen group to work with the BOP staff to construct a CIP that defines the participatory responsibilities for both the BOP and citizens. Then this group should formulate the selection criteria for a CIC committee and then select the committee members. Portland should allow this CIC to review the periodic review evaluation and work plan and to act independently of, rather than subordinate to, the BOP.

Does the Objection Meet the Criteria for a Valid Objection: Yes.

DLCD Response:

Goal 1 clearly provides that a local government may assign to the planning commission the duties and responsibilities of developing, adopting, and implementing a CIP, which would otherwise be the responsibility of the Citizen Involvement Committee. However, it must submit its reasoning for doing so to LCDC and the CIAC. Mr. Bartlett has asserted that the City previously did not comply with all of the requirements before utilizing the planning commission as a committee for citizen involvement. Regardless, because a valid objection to an evaluation and work program must clearly identify an alleged deficiency in the evaluation or work program, as opposed to past practices of a local government, the department only considers the fourth objection as it relates to the adequacy of the future participation of members of the planning commission in the CIC. The objection fails to connect that historic circumstance with any deficiency in the proposed work plan submittal under review. To the extent the objection can be understood to contend that citizen involvement in development of the work program was thereby flawed, the objection does not establish how the work program fell short of the requirements for citizen involvement in OAR 660-025-0080(2)(a).⁷ To the extent the objection can be understood

⁶ The proposed CIC will consist of three members of the City Planning Commission and at least nine others members nominated by the Mayor and confirmed by the Portland City Council.

⁷ OAR 660-025-0080(2) provides in part:

“Each local government must review its citizen involvement program and assure that there is an adequate process for citizen involvement in all phases of the periodic review process. Citizen involvement opportunities must, at a minimum, include:

to contend that in the future the CIC will be dominated by the planning commission members, the department does not see any adequate basis to predict that outcome. The fourth objection does not establish how the City's proposed "Public Engagement Work Program" submittal, as amended to address the CIAC recommendations for improvements to the work program for consistency with Goal 1, is not consistent with the applicable goal and rule requirements.

DLCD Conclusion: The fourth objection of Mr. Bartlett is **valid, but it fails to demonstrate any violation of a statewide planning goal or rule. As a result, the Department rejects the objection**

B. Lynn Schore, et al.⁸ – One Objection

Objection: Ms. Schore objects that the City is not enforcing the zoning code against the Portland Public Schools (PPS) for violations that she alleges result in segregation, concentration of poverty, and lack of equal access to education in the City; that the public is being denied the right to speak on this issue; and that the City plans to make changes to the zoning code, without public input, that will retroactively legalize PPS's actions.

Objector's Suggested Remedy: Objector Schore lists eleven recommendations.

1. Make no changes to the Zoning Code now or in the near future, to allow for public discussion of the issues raised by the violations.
2. Do not hold any more private meetings regarding the PPS zoning violations and prepare public notes of all previous and future meetings on the subject.
3. That the City Attorney, the City Auditor, and the Oregon Attorney General conduct a full review of the Zoning Code violations.
4. Make public the list of school sites where PPS violated the Zoning Code developed between the PPS and BDS.
5. Make public the actual number of complainants, without identifying the complainants, and the specific complaints at each PPS school.
6. That the City Attorney, the City Auditor, and the Oregon Attorney General conduct a full review of the PPS violations of the City School Policy over the course of twenty school closures.
7. Establish web links to the following three documents on the City's website, the City Auditor's website, and the City Archives' website and make the same documents available at the BOP offices:

- City School Policy: City of Portland, Oregon. Adopted as Policy 11-63 of Exhibit A of Ordinance 150580
- February 2000 City Schools Agenda: Priority Strategies of Mutual Interest to the City of Portland and Portland School Districts
- 1957 Land for Schools Report

“(a) Interested persons must have the opportunity to comment in writing in advance of or at one or more hearings on the periodic review evaluation. Citizens and other interested persons must have the opportunity to present comments orally at one or more hearings on the periodic review evaluation. Citizens and other interested persons must have the opportunity to propose periodic review work tasks prior to or at one or more hearings. The local government must provide a response to comments at or following the hearing on the evaluation.”

⁸ Lynn Schore's objection was co-signed by Steve Linder, Shei'Meka Newmann, Dixie Johnston, Maryann Schwab, Nancy Smith, Anne Trudeau, Annie Graves, and Andrea Linder.

8. Work with interested parties to develop a set of “search terms” that will link citizens with the above documents.
9. Convene a Citizen Summit, sanctioned by the City and on City property to discuss the above issues (this recommendation was presented to the City by SEPL in a letter dated 8/6/08).
10. In the long term, make a change to the Zoning Code to require a Conditional Land Use Review at all public schools in the City whenever a grade level change is made to a school.
11. In the long term, make a change to the Zoning Code to require a Conditional Land Use Review anytime a public school is changed from a neighborhood school to a magnet school, focus option school, or charter school.

Does the Objection Meet the Criteria for a Valid Objection: No.

The Department determines that the objection fails to satisfy the rule criterion: “Clearly identify an alleged deficiency in the evaluation, work program or decision that no work program is necessary.” OAR 660-025-0100(2)(b). The subject matter of this objection is outside of the scope of periodic review. Although the public facilities element of the Portland Comprehensive Plan includes goals and policies related to the enhancement of educational opportunities, and periodic review must include an update the public facilities element of the plan, this objection does not identify a deficiency in the evaluation or the work program. Rather, it asserts a problem with enforcement of the acknowledged zoning code.

The City has recognized the concerns of Ms. Schore and is addressing these concerns on an ongoing basis both as part of the Portland Plan development, and on a more immediate code enforcement basis.

DLCD Conclusion: This objection is not valid and the Department must reject the objection pursuant to OAR 660-025-0100(3).

C. Linnton Neighborhood Association (LNA), Pat Wagner

Objection: DLCD understands LNA to be alleging violations of Goals 1 and 2.

Summary: In violation of Goal 1, LNA alleges that the residents were denied a seat on the River Committee and that the River Committee meetings were held at inconvenient times for residents; that the documentation of public outreach in the draft River Plan is inaccurate and, in some instances, untrue; that notifications of meetings are only posted on the City’s website and are not sufficiently labeled or conspicuous to allow the layperson easy access to the information; that it is a conflict of interest for the chairperson of the River Committee to also be the chairperson of the Planning Commission; and that the Planning Commission was instructed to ignore public testimony. In violation of Goal 2, LNA alleges that the River Plan North Reach excludes involvement by a cross section of the affected citizens from the planning process, that there was less than thirty days notice for public hearings on the draft of the River Plan, and, while public comment was extended, no more oral testimony was taken.

Objector’s Suggested Remedy: LNA does not assert any specific work tasks to resolve these alleged deficiencies.

Does the Ojection Meet the Criteria for a Valid Objection: No.

The LNA has not satisfied the criteria for a valid objection. Ms. Wagner has not established that she, or the LNA, participated at the local level, orally or in writing, during the

local process leading to the City's evaluation and work program. The objection that the LNA asserts is in regard to the River Plan North Reach which is a planning process that is outside the scope of periodic review. Therefore, the objection fails to clearly identify a deficiency in the adopted evaluation or work program. Also, even if the objection addressed the periodic review evaluation and work program, it does not suggest any specific work tasks to be included in the Work Program that may resolve these deficiencies.

DLCD Conclusion: This objection is not valid and the Department must reject the objection pursuant to OAR 660-025-0100(3).

Dated this ___ day of September, 2009.

Notice: Pursuant to ORS 197.633(3) and OAR 660-025-0110(4), this decision is final and may not be appealed.

City of Portland
APPROVED
PERIODIC REVIEW WORK PROGRAM SUMMARY

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Washington County Planning Manager: Brent Curtis Phone: 503-846-3519

Date Work Program Approved by DLCD: **September 30, 2009** **Order 001773**

Final Work Program Completion Date: **October 01, 2012** **Order 001773**

Work Program Task Completion Summarized:
 T#, approved, date, order 0017xx, description

Major Work Tasks Subject to Public Notice and DLCD Review
(See OAR 660-25-130 - submission of completed work task)

Task #	Work Program Reference	Task Summaries and Product Descriptions	Submittal Date (s)
1	CITIZEN INVOLVEMENT PROGRAM	<p><i>Implement: Citizen Participation Strategy consistent with Goal 1, and Committee for Citizen Involvement</i></p> <p><i>Subtask A: <u>Establish Community Involvement Committee</u></i></p> <p><i>Subtask B: <u>Review elements of the staff's citizen involvement program for sufficiency and possible improvements</u></i></p> <p><i>Subtask C: <u>Consultation and Recommendations to City Commission</u></i></p> <p><i>Products:</i> 1) <i>A Community Involvement Program consistent with the requirements of Goal 1, and approved by the Committee for Citizen Involvement</i> 2) <i>Appoint Community Involvement Committee</i></p>	<p>09/30/2009</p> <p>10/31/2009</p> <p>Ongoing</p> <p>10/31/2009</p>

Task #	Work Program Reference	Task Summaries and Product Descriptions	Submittal Date (s)
2	LAND USE INVENTORY AND ANALYSIS	<p><u>Research and Analysis to establish a solid factual basis for comprehensive plan updates in the periodic review process consistent with the requirements of Goal 2.</u></p> <p>Subtask A: <u>Establish the amount of existing land supply for residential and non-residential uses by developing an inventory of constrained, highly constrained and unconstrained lands on a parcel specific basis.</u></p> <p>Subtask B: <u>Evaluate the above to determine development potentials for housing and employment, including appropriate assumptions for infill and redevelopment. .</u></p> <p>Subtask C: Identify Employment Needs: A new Economic Opportunities Analysis will be prepared in accordance with requirements for same found in OAR 660, Division 9. Reexamine the adequacy of its existing industrial land base, identify "prime" industrial land, and characterize long-term and short-term supplies of industrial land suitable for different employment types. Assess the adequacy of its land base for non-industrial employment considering urban centers, institutional land needs (e.g., schools, hospitals and universities). Estimate amount of brownfields land that can be remediated and returned to short term supply.</p> <p>Subtask D: Identify Housing Needs. Recognizing Metro's 20-year population forecast, residential urban growth report, and allocation of regional housing potential pursuant to ORS for the amount of housing affordable for different brackets of household income. Expected surpluses and deficiencies in different housing types and affordability ranges will be identified. Check the residential inventory for zoning potential of 10-units per acre, and whether half the remaining potential is for multi-dwelling or attached single dwelling structures under the provisions of OAR Chapter 660, Divisions 7 and 8.</p> <p>Products: 1) Inventory and Analysis of Housing and Employment Needs: 2) Estimates of Jobs and Housing Capacity: Final Report on Determination of development potential</p>	03/31/2009
3	ALTERNATIVE PATTERNS OF DEVELOPMENT	<p><u>Develop and evaluate alternative patterns of development as depicted by use, intensity, and urban form.</u></p> <p>Subtask A – Develop Evaluation Criteria and ESEE Measures Including state requirements for the examination of the economic, social, environmental, and energy consequences of different choices. Additional evaluation criteria will be derived from community values identified through the visionPDX project.</p> <p>Subtask B –Develop Alternatives Simplified analysis will be applied to different patterns of urban development. Several alternatives will be designed to emphasize particular community values.</p>	

Task #	Work Program Reference	Task Summaries and Product Descriptions	Submittal Date (s)
3	ALTERNATIVE PATTERNS OF DEVELOPMENT (continued)	<p><i>Subtask C- Detailed Alternative Analysis</i> Detailed consequence analysis will be applied to a base case derived from a probable build-out of the existing comprehensive plan, and at least three other alternatives - each trying to achieve an optimum mix of community value.</p> <p>Products: Consequence analyses of alternative distribution patterns of needed housing and employment</p>	04-2010
4	POLICY CHOICES	<p>Updates to Traditional Comprehensive Plan Elements, including COORDINATION with Metro, the regional government</p> <p><i>Subtask A- Physical Plan (New Comprehensive Plan Map)</i> A Physical Plan map to replace the existing Comprehensive Plan map. Other periodic review policy choices will be derived from the future development pattern depicted on the map.</p> <p><i>Subtask B- The Economic Element</i> Complete and utilize the EOA to adopt long-term policies and shorter-term strategies for economic development. Establish employment districts. Identify sufficient vacant, partially developed, and re-developable land to meet expected employment needs.</p> <p><i>Subtask C-Housing Element</i> Adopt long-term policies and shorter-term strategies for meeting identified housing needs. Consider alternative housing conservation policies, particularly policies aimed at preserving the existing stock of affordable housing. Identify sufficient vacant, partially developed, and re-developable land will be identified to meet expected employment needs.</p> <p><i>Subtask D Public Facilities Element</i> New facilities plans* will be developed to meet service requirements of the physical plan. Updates to the new public facility plans are likely through post-acknowledgement plan amendment processes to take account of future, better forecasting and modeling within the next four years. Undertake School facility planning pursuant to 195.110 School facility plan for large school districts</p> <p>*Sewer, drainage, and water projects, Portland International Airport; whether to continue or discontinue operation of the Portland Heliport.</p>	

Task #	Work Program Reference	Task Summaries and Product Descriptions	Submittal Date (s)
4	POLICY CHOICES (continued)	<p>Subtask E- <u>Transportation Element</u> <i>Amend the city's Transportation System Plan after updates to the Regional Transportation Plan is complete As authorized by the Regional Transportation Plan, adopt alternatives to the "Level of Service" standard for characterizing the adequacy of existing and proposed transportation facilities. These alternatives might apply citywide or only within designated areas. In the absence of further state guidance the City might also adopt standard methods for examining the transportation effects for proposed intensifications or urban development. Consider a system of modal preferences or desired mode splits as part of its street classification scheme.</i></p> <p>Subtask F- <u>Population and Coordination with Metro Element</u> <i>As a final subtask, and in conjunction with the finalization of the Economic and Housing elements, the city will coordinate with Metro to the extent necessary to obtain an allocation of both projected new jobs and dwelling units that are expected to be accommodated within the city limits. Once available, both twenty-year forecasts for employment and residential uses shall be "point" forecasts, that is, an absolute number as contrasted with a range forecast.</i></p> <p>Products: <i>Revised Comprehensive Plan Policies and Revised Comprehensive Plan Map</i></p>	<p>12-2011</p> <p>12-2011</p>
5	IMPLEMENTATION	<p><i>Using a combination of regulatory, government-to-government, private/public partnerships, by May, 2012 develop an array of implementation measures, including but not limited to:</i></p> <ul style="list-style-type: none"> • Retention measures for prime industrial land and affordable housing stock, • Remediation programs for brownfields • Application of minimum density requirements to mixed use development or residential development in non-residential zones, • Form-based design standards, • Construction of additional streetcar lines, • Interagency agreements with special districts, • Establishment of new urban renewal areas, • A standard method for estimating traffic generation potential of proposed plan amendments, • Inter-bureau strategies to carry out plan objectives, • Adjustment of height, noise, and use limitations around airport. <p>Products <i>Revised land use regulations and zone maps:</i></p>	<p>July 2012</p>

Additional Comments:

The dates above are established for the city to submit completed work tasks to DLCD. Interested persons or agencies are advised to contact Al Burns, City Planner, (503) 823-7700, if you are uncertain as to how you will be notified and involved at the local level. The city will provide you with notice of public hearings of those work tasks affecting your agency. However, agencies and other interested persons are advised to monitor subtasks related to that work task, particularly the adoption of needed amendments to the city's comprehensive plan and land use regulations. LCDC rules require that an objecting party participate at the local level orally or in writing during the local review process.

Federal and State Agencies, Special Districts, Affected Local Governments and Interest Groups Participating in Review:

<u>Agency/Interested Groups</u>	<u>Contact</u>
Dept. of Fish and Wildlife (ODFW)	Patty Snow
Division of State Lands (DSL)	Peter Ryan
Economic and Community Development. (ECD)	Paul Grove
Dept. of Transportation (ODOT), Region 1	Lainie Smith
State Historic Preservation Office (SHPO)	Stephen Poyser
Dept. of Water Resources (WRD)	Bill Fujii
Dept. of Environmental Quality (DEQ)	Greg Aldrich
Parks and Recreation Department (OPRD)	Jan Houck
Housing and Community Services (HCS)	Rick Crager
Dept. of Aviation (DOA)	Christopher Cummings
Dept. of Human Services (DHS)	Tom Pattee
Economic Revitalization Team (ERT)	Mark Ellsworth

NOTE: Enclosed for city's information and use are:

- 1) a copy of the current periodic review rule;
- 2) a sample "completed work task" notice to be sent by the local government to persons (if any) who participated at the local level or who requested notice;
- 3) copies (yellow) of Notice of Periodic Work Task, forms to be sent by local government to DLCD with each completed work task; and
- 4) list of the State Periodic Review Assistance Team Members.

Please contact Larry French at (503) 373-0050, extension 283 if you have questions or need additional forms.