



September 5, 2017
Jim Rue, Director
Oregon Department of Land Conservation and Development
635 Capitol St. NE, Suite 150
Salem, OR 97301-2540

Re: DLCD Review Task 4 & 5

Dear Mr. Rue:

The *2035 Comprehensive Plan* for the City of Portland is one of the most significant land-use planning projects ever undertaken in Oregon. As you know, it will be the governing document at a time when Portland is projected to grow rapidly because it has been nationally recognized as a desirable place to live. This growth will define the shape, quality, and character of Oregon's largest metropolitan area over the next 20 years, and this development will continue to influence Portland beyond 2035.

It is critical that the Plan be drafted and adopted in accordance with our State Land Use Goals that guarantee citizen involvement in all aspects of this important planning process. Public input to the Plan is invaluable because it provides "truth on the ground" from the people who have everything at stake in ensuring that Portland continues to be a desirable place to live now and long into the future.

During Task 4, when the Plan policies were drafted, Portland residents submitted thousands of pieces of testimony on issues of utmost importance to them. After the Task 4 work product was adopted by City Council, our neighborhood association filed several objections to the Task 4 work product.

The Oregon Department of Land Conservation and Development has the task of reviewing and approving the Plan. We recently learned that the DLCD delayed consideration of the Objections filed by the Multnomah Neighborhood Association to Task 4 of the City of Portland's Periodic Review. We find this ill-advised and urge you to move forward with this process right away if it is not already under way.

Task 4 represents the policies of the 2035 Comprehensive Plan, and therefore is a critical step in the process upon which future City planning must be based. Task 4 requires DLCD

review and approval in order to be finalized. However, we now understand that DLCD has waited on Task 4 review until after Task 5 (implementation) has been submitted, and to consider the entire package together.

We believe this additional delay was unreasonable and unacceptable, given how far behind schedule the Periodic Review process is. And, we believe that Task 4 should be reviewed by DLCD before Task 5, since this is a well-defined, sequential process.

The City of Portland initially offered to extend the 120-day review deadline for Task 4 due to the large record size. In the April 28, 2017 letter from Mayor Ted Wheeler, it states:

Due to the large size of this record, the City will extend the 120-day deadline for DLCD review until November 1, 2017.

The letter goes on to say that the City wants to begin implementing its Task 4 Plan in early 2018, implying that it does not wish this review extension to interfere with this implementation schedule.

Why did DLCD not immediately begin a review of Task 4? The identified issue justifying the delay is the size of the record. This is not a justifiable rationale to postpone Task 4 review until Task 5 is noticed so that the DLCD can review an even larger amount of material at the same time.

James Peterson, Land Use Chair of the MNA, received an email from the DLCD's Anne Debbaut on July 10, stating:

We have not yet made a request for the City to point the department to relevant locations in the record regarding periodic review Task 4 objections as the City has waived the 120-day DLCD deadline for review of the Task 4 submittal. At the time of the waiver, the City anticipated submitting Task 5 in the coming months and indicated that the waiver for Task 4 would facilitate a more coordinated review of the materials.

At this time, our department anticipates reviewing Task 4 together with Task 5 upon the Task 5 submittal.

The entire Periodic Review process is already far behind schedule. The City of Portland generated additional delay by failing to issue a final notice for Task 4 for 10 ½ months. Task 5 is already two years late, based on the most recent DLCD-approved Work Plan. The City generated further delays by not issuing the final notice for Task 5 in a timely manner.

Meanwhile, the City is busy implementing a comprehensive plan which has not been approved, and for which there are substantive formal Objections filed. We cannot understand why the Department would allow the City to proceed to the point of implementing a Plan that has not been approved. We also wonder how this might affect consideration of our Objections, since the City is committing significant resources towards a

plan that we believe has fundamental errors that must be corrected.

Since the DLCD has not offered any clear, rational explanation for delaying the Department's Task 4 review and for combining it with Task 5 review, we believe this is an unnecessary delay and ask the DLCD to immediately begin the Task 4 review if it is not under way. The Task 5 submittal comes with a new 120-day time limit for review. With DLCD's limited resources, the amount of time for review will be a factor the quality of the review.

It may be necessary for the Director to ask the Commission for an extension to ensure adequate time is allowed to review Task 4 and 5 in sequential order.

Your prompt consideration of this matter would be appreciated.

We are requesting a copy of the work plan (allotted staff, projected hours and time line) for this significant review of a project that will affect all of Oregon for years to come.

Sincerely,



Martie Sucec
Chair
Multnomah Neighborhood Association

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