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May 9, 2016

Multnomah County
Planning Commission
c/o 1600 SE 190th Avenue
Portland, Oregon 97233

RE: OPEN RECORD SUBMISSION - Draft Comprehensive Plan Updates

Dear Planning Commission:

Metro appreciates the opportunity to participate in this process. In Metro's letter submitted May 2, 2016, we presented comments and concerns, as well as proposed revisions to the County's draft comprehensive plan language. Unfortunately, our limited interaction at the May 2nd hearing did not allow us to effectively address Metro's issues of concern through a constructive dialogue. Metro is thankful the Planning Commission elected to allow more time for its Commissioners to consider and debate the concerns of Metro and those who testified.

The intent of this letter is to discuss the plan amendment process and address the comments towards Metro and its submission at the May 2nd hearing.

In this Comprehensive Plan update process, the Planning Commission is performing a very important function – one that has not been performed at this level since 1977. To date, the update has been a citizen-driven process, with the Citizen Advisory Committee (CAC) submitting its recommendations to the Planning Commission for consideration and discussion. The Planning Commission represents the first government body to review the draft plan in the interests of all Multnomah County residents and service providers and thereafter provide policy decision guidance to the Board of County Commissioners.

In Metro's opinion, the three most critical elements of a comprehensive planning update process is a diverse citizen involvement, partnering public agency coordination, and transparency. The plan should reflect the interests, goals and strategies that meet the needs of all County residents. The process also attempts to ensure the compatibility of County planning programs with those of other jurisdictions and agencies. Coordination with other governmental agencies and refining the plan is essential to achieve this end.

The Statewide Planning Goals are Oregon's mandatory standards for comprehensive planning. The Goals set requirements for comprehensive plans. With respect to the

County's natural resources, and open space/recreational policies, Statewide Planning Goal 8 calls for the County to evaluate its recreational areas and facilities and develop plans to deal with the projected demand for new recreational opportunities.

Goal 8's planning guidelines are as follows:

- “1. An inventory of recreation needs in the planning area should be made based upon adequate research and analysis of public wants and desires.
2. An inventory of recreation opportunities should be made based upon adequate research and analysis of the resources in the planning area that are available to meet recreation needs.
3. Recreation land use to meet recreational needs and development standards, roles and responsibilities should be developed by all agencies in coordination with each other and with the private interests. Long range plans and action programs to meet recreational needs should be developed by each agency responsible for developing comprehensive plans.
4. The planning for lands and resources capable of accommodating multiple uses should include provision for appropriate recreation opportunities.
5. The *State Comprehensive Outdoor Recreation Plan* could be used as a guide when planning, acquiring and developing recreation resources, areas and facilities.
6. When developing recreation plans, energy consequences should be considered, and to the greatest extent possible non-motorized types of recreational activities should be preferred over motorized activities.
7. Planning and provision for recreation facilities and opportunities should give priority to areas, facilities and uses that
 - (a) Meet recreational needs requirements for high density population centers,
 - (b) Meet recreational needs of persons of limited mobility and finances,
 - (c) Meet recreational needs requirements while providing the maximum conservation of energy both in the transportation of persons to the facility or area and in the recreational use itself,
 - (d) Minimize environmental deterioration,
 - (e) Are available to the public at nominal cost, and
 - (f) Meet needs of visitors to the state.
8. Unique areas or resources capable of meeting one or more specific recreational needs requirements should be inventoried and protected or acquired.
9. All state and federal agencies developing recreation plans should allow for review of recreation plans by affected local agencies.

10. Comprehensive plans should be designed to give a high priority to enhancing recreation opportunities on the public waters and shorelands of the state especially on existing and potential state and federal wild and scenic waterways, and Oregon Recreation Trails.

11. Plans that provide for satisfying the recreation needs of persons in the planning area should consider as a major determinant, the carrying capacity of the air, land and water resources of the planning area. The land conservation and development actions provided for by such plans should not exceed the carrying capacity of such resources.”

Similarly, Statewide Planning Goal 5 directs the County to protect natural resources and conserve open spaces, which includes land for recreational uses. In Goal 5 we see the carrying capacity of the natural resources as a planning consideration.

Throughout the above Statewide Goal planning and policy directives are the requirements of ensuring adequate recreational opportunities for a diverse and growing public with different abilities, to conserve energy by providing opportunities close to urban centers and for non-motorized recreational activities, and highlighting the importance of properties and areas that can meet multiple needs and objectives and within the carrying capacity of the land. All of those policy objectives pertain to Metro, its lands, and its role as a County natural area, park and recreation service provider.

Following Metro’s brief presentation before the Planning Commission, the commissioners heard testimony that stressed the importance of recognizing the urban/rural lands interface value, and their reliance on each other to sustainably and fully serve all citizens of Multnomah County. Those offered thoughts are in line with Metro’s position as well as the planning directives of our Statewide Planning Goals. The CAC member also expressed concern that the plan amendment process to date has largely left the vast majority of Multnomah County residents – those not residing in rural areas – out of the process in both form and function.

The Commissioners also heard testimony that sought to isolate the County’s rural lands and residents. Additional testimony was received that requested the commissioners to downplay Metro’s role as a natural area and parks provider and to support draft language that, in Metro’s respectful opinion, would misrepresent Metro; misrepresent Metro’s land policies and management objectives; *regulate recreational uses on resource lands more stringently than other more intrusive and invasive forms of development*; and thereby frustrate and burden Metro’s ability to serve a diverse and growing population of County residents and their needs within Metro’s parks and natural areas program.

The issues and policy considerations have been framed for the Planning Commission. Respectfully, Metro requests that Metro, its services, and the recreational needs of County residents be represented and supported in the plan language through a more balanced approach as proposed by Metro’s amendments.

Metro thanks you for the opportunity to address these matters and appreciates your considerations.

Respectfully,

A handwritten signature in black ink, appearing to read "G Shepherd", with a stylized, cursive script.

Gary Shepherd
Office of Metro Attorney

cc: Michael Cerbone
Rich Faith