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May 9, 2016

To: Multnomah County Planning Commission
1600 SE 190th Ave.
Portland, OR 97233

Subject: Draft Comprehensive Plan

Chair Ingle and Commissioners,

I have reviewed Carol Chesareks' comments on the Draft Comprehensive land use Plan and the TSP (both documents, dated 05/02/16 and 05/09/16). I concur and support Carol's careful analysis, and I value her close reading and reasoned arguments for her positions and appreciate the value of her supporting documentation for her acceptance or rejection of existing and proposed changes to the Draft documents.

I am primarily interested at this time to commenting on the proposed changes that have been proposed in the comments submitted by Metro in their document [insert title] at the Planning Commission public hearing held on 05/02/16.

Rather than going through the document point by point, as Carol has done, I would prefer to offer an overview of what the changes that Metro is seeking appears to mean.

In summary:

Metro's requested changes seems to emphasize the importance of the value of the area to human use, recreation, trails, and opportunities for interaction between nature and humans, at the expense of the preservation/promotion of undisturbed intact natural areas, wildlife habitat, and water quality.

Evidence for this can be seen in:

- The substitution of park for open space.
- The request for the removal of "wildlife corridors connections"
- The use of the word "protect" rather than #promote" when referencing fish and wildlife habitat.
- Suggested removal of "rural"; re: residents (see, Nystrom comment) Chapter 8, p. 8, Goals, Policies, and Strategies
- Reference to "extensive network of trails" (in Tualatin Mountains) that does not exist.
- The suggested deletion of "within natural ecosystems" from 5.26
- The insistence that recreational uses not be held to a higher development standard than residential, for example; re: Chapter 8, p. 9, West Hills Policies and Strategies.
- The emphasis that Multnomah County, as the entity that has jurisdiction over and administration of its rural areas, acknowledge Metro as an equal partner and that Metro's priorities must be accommodated.

- Metro other objections to language within the newly adopted SIMC Rural Areas Plan; items #10-#16.

Thank you very much for your consideration,
George Sowder