

12 May 2017

Oregon Department of Land Conservation and Development  
Attn: Periodic Review Specialist  
635 Capitol St. NE, Suite 150  
Salem, OR 97301

DEPT OF

MAY 15 2017

LAND CONSERVATION  
AND DEVELOPMENT

Susan Anderson, Director  
Portland Bureau of Planning  
1900 SW 4th Ave., Suite 7100  
Portland, OR 97214

Greetings all,

I object to Portland's Task 4 update of the Comp Plan under Periodic Review, focusing on the adoption of Middle Housing Policy, Policy 5.6.

This policy was introduced on March 18, 2016, in a massive document less than three months before the Comp Plan was adopted by City Council on June 15, allowing little time and transparency for the public to comment. (Specific objections are attached, outlined by the Multnomah Neighborhood Association's James Petersen, and are incorporated herein.)

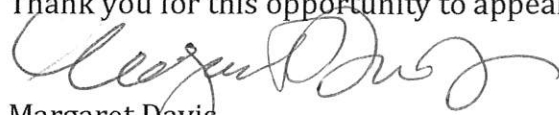
My second objection relates to the zoning of Northeast Fremont Street. The Beaumont-Wilshire Neighborhood Association filed comment to zone the area of NE Fremont running through Beaumont Village to a lower-density CM1 on the basis of lack of street connectivity, lack of frequent service by transit (and none planned for the foreseeable future, per TriMet planners), and other factors. The neighborhood association was assured by planners that CM1 was the proper designation.

However, the Comp Plan shows the zoning for that area of NE Fremont changed to a higher-density CM2 designation. When visiting the land use board of Central Northeast Neighbors on March 9, 2017, city planner Sara Wright indicated that sometimes changes are made last-minute to the Comp Plan, and that was just the way things worked.

For a city that prides itself on neighbor involvement (Wright also said at the March 9 meeting that "the city takes neighborhoods very seriously"), last-minute reversals such as this void the public input/accountability elements of comprehensive planning.

Please void both the change for NE Fremont from CM1 to CM2 and the Middle Housing Policy.

Thank you for this opportunity to appeal and object,



Margaret Davis  
4216 NE 47th Ave., Portland, OR 97218

## Summary of Objections to Middle Housing Policy

The Multnomah Neighborhood Association is filing formal objections to the Department of Land Conservation and Development (DLCD) regarding Portland's Task 4 update of the Comprehensive Plan under Periodic Review. The objections focus on the adoption of the **Middle Housing Policy, Policy 5.6**, which was a last-minute amendment to the Comprehensive Plan Update.

Policy 5.6 was first introduced in a package of amendments released on March 18, 2016, in a 112-page document containing hundreds of amendments. This was less than three months before the City Council adopted the final Comp Plan on June 15<sup>th</sup>. The policy is now being implemented in the Residential Infill Concept Project and could result in the rezoning of almost 100,000 single family lots throughout Portland and allowing density to more than double in most of the city's single-family residential neighborhoods. It would affect 65% of all single-family properties in the city and the results could dramatically change established neighborhoods.

The City of Portland's planning for Periodic Review has failed to comply with fundamental requirements of both State and local planning regulations. By filing formal objections with DLCD, we hope to clearly demonstrate a number of critical deficiencies in the planning process, including:

- Failure to fully comply with Statewide Goals 1 and 2, as required in Periodic Review. This includes failure to comply with the City's own *Periodic Review Work Program* and its *Community Involvement Work Program*, as required.
- Failure to support or justify actions with objective evidence, even though the action would have significant consequences. For example, failure to show that new affordable housing would be created with a policy that could reduce existing affordable housing by incentivizing redevelopment. Also, failure to base planning on actual housing needs identified in planning reports.
- Failure to adequately inform the public about the potential impacts and consequences of policies under consideration. For example, failure to show how many homes would be impacted by a proposed policy, failure to show how those homes could be impacted, and failure to notify homeowner that their homes could be rezoned.
- Failure to plan in a comprehensive manner, rather than a piecemeal manner. This includes planning for greatly increased growth capacity without concomitant infrastructure planning to support that growth.

In order to develop these (and other) issues in formal objections, we have retained an attorney and hired a professional planner. The MNA is also pursuing objections to the "center" designation which would transform Multnomah Village into a more-intensive urban form than is supported by residents of the area.

For more information, contact:  
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