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10 September 2017

Multnomah County Planning Commission, c/o Kevin Cook
Multnomah County Dept. of Community Services
1600 SE 190th Avenue, Suite 116
Portland, OR 97233

Re: Case File PC-2015-4679
Submitted 9.10.2017 via email to Kevin COOK kevin.c.cook@multco.us

Dear Commissioners:

I was an active participant throughout the Sauvie Island/Multnomah Channel planning process in 2013-2015. As that process moved to a close it was apparent to staff and to community participants that the meat of plan implementation would depend on code development. Now, in the third quarter of 2017, the public has its first opportunity to see and comment upon staff's recommended code consolidation and reorganization.

I am unable to attend the September 11 hearing as I am out of state until Thursday the 14th. I ask that this letter be made part of the record of the September 11 meeting, and that you instruct staff to provide additional information (and time) for the public to understand and comment on (at least) the following issues:

1. I strongly object to staff's recommendation that where code provisions cover similar activity (for different areas, presumably) but are slightly different, the more permissive standard apply. I have not had any opportunity to wade through the hundreds of pages of code to determine where those choices have been made (they are not highlighted or identified in any way). Hence, I do not know how they affect the careful work done to fine-tune Sauvie Island planning direction. The public deserves an opportunity to see those choice points listed and to comment upon them. Choosing more permissive language may sound positive, but it can backfire when the more stringent language was put there for a good reason in the first place.
2. I have no idea why staff has chosen to defer codification of new floating home/moorage/marina policies. Those policies were carefully developed and worded with care, and should have been high priority for translation into code. The result of this deferral is that code completely inconsistent with the current planning documents remains on the county books. Please
 - a) obtain a clear explanation from staff as to what has caused this deferral;

- b) obtain assurance that no land use decisions or application approvals will be made through application of the "old" code [as an example, one floating home per 50 feet of land frontage];
 - c) direct staff to notify interested parties of opportunities to review draft code provisions before they are bundled for planning commission consideration.
3. Similarly, why did staff choose to defer codification of the requirement that new residential development recognize and accommodate existing farm and forest practices?
 4. During the Sauvie Island/Multnomah Channel planning process issues surrounding Multnomah County's provisions for the Willamette Greenway (WRG) arose repeatedly. They were not on the table for the SI/MC, but deserve to be directly addressed, updated and strengthened. There seems some confusion as to whether overlays such as the WRG are included in this Reorganization Project. Chapter 39 is not listed in the staff report. Yet the Overlay provisions are included as Part 5 of the Draft Code. Please ask for clarification, and above all set a process in motion for reviewing and strengthening the county's WRG provisions.

As always, I thank you for your volunteer work as members of the Planning Commission, and for your consideration of these important matters.

Sincerely,


Anne W. Squier