

November 10, 2014

Planning and Sustainability Commission
City of Portland
1900 SW 4th Avenue, Suite 7100
Portland, OR 97201

Subject: City of Portland Proposed Draft 2035 Comprehensive Plan

Dear Commissioners:

Following are comments and recommendations from the City of Portland's Public Involvement Advisory Council (PIAC) on the Proposed Draft 2035 Comprehensive Plan. PIAC is a City commission charged with advising elected officials on public involvement in government citywide, and with helping City bureaus improve their community outreach and engagement practices. Established by City Council in 2008, PIAC is comprised of both community members and bureau staff.

Members of PIAC have worked closely with Bureau of Planning and Sustainability (BPS) staff, through both PIAC and the Policy Expert Group (PEG) for the Comprehensive Plan community involvement chapter. We have greatly appreciated the opportunity for sustained input on earlier drafts of the Comp Plan, and for a productive, collaborative relationship with BPS staff over the past two years, particularly Marty Stockton through PIAC and the PEG and Deborah Stein through the PEG. PIAC's comments are intended to offer the collective expertise and experience of PIAC members to strengthen an already strong document, and we limit our remarks to Chapter 2, the goals and policies regarding community involvement.

Our overarching comment is that the community involvement chapter is **clear, comprehensive and exceptionally relevant** to an evolving Portland. It is responsive to the mandates of State planning law, and consistent with the vision of the Portland Plan. PIAC strongly **supports the intention to develop a manual** to guide the implementation of the Plan's policies, and we believe this approach has the potential to become a model for other jurisdictions.

Where PIAC recommends revisions to the proposed draft, it is generally to restore elements that were removed from the previous draft we reviewed in March.

Recommendations

1. **Make a clear distinction between policies that require ongoing action by bureaus and their staff and policies that are project-specific.** This distinction was made and explained throughout earlier drafts on which PIAC members had input. It is an important distinction because it clarifies (a) who is responsible for carrying out the policy (the bureau as a whole or an individual staff member), (b) when the policy applies (as part of an ongoing program or when staff begin to work on a project), and (c) how to evaluate a policy (as part of an ongoing program or as it was implemented for specific projects). The previous draft of the Plan achieved this by categorizing policies 2.1-2.16 as “ongoing” and policies 2.17-2.33 as “project-specific.”
2. **Restore policy language on adequate funding for the community involvement program.** In order to carry out the policies of the Comp Plan, bureaus must devote sufficient financial and staff resources to the community involvement program itself, and must provide staff with training and support. Indeed, the commitment of adequate resources marks the difference between a policy that makes a meaningful difference in the City’s work and one that looks good on paper.

PIAC understands the recommendations from the City Attorney and OMF to remove funding questions from Comp Plan policy on the grounds that “The budget is not a land use decision” (Editing Change List note). However, the intent of this policy is not to compel elected officials to increase bureau budgets, but to direct bureaus to allocate a sufficient portion of their budgets (whatever those budgets might be) to implement the requirements of the Comp Plan.

3. **Appoint an independent body, rather than the Planning and Sustainability Commission (PSC), to oversee the Community Involvement Program.** Throughout the process of community input on earlier drafts of the chapter (including the Community Involvement PEG), the composition of the Community Involvement Committee (CIC) was left unspecified. In the proposed draft, a subcommittee of the PSC serves as the CIC. The reason for this decision is not discussed in the Editing Change List. We understand that there are resource constraints in establishing new committees. However, PIAC believes there are advantages to appointing a separate body apart from the PSC.

First, the CIC must have the capacity to evaluate community involvement programs for multiple bureaus, review community involvement plans for numerous individual projects, and create and maintain a community involvement manual to implement the Comp Plan goals and policies. It seems unrealistic to expect the PSC, a body already charged with significant responsibilities and workload, to take on this additional role.

Second, we concur with the State’s Citizen Involvement Advisory Committee (CIAC), the body that advises Oregon’s Land Conservation and Development Commission (LCDC) on public involvement in land use planning, that the multiple responsibilities of the PSC can detract from, or even conflict with, the role of the Committee on Citizen Involvement (CCI):

“Having a CCI – a committee with citizen involvement as its *only* responsibility – ensures that citizens are not forgotten in the planning process.... An independent CCI is the best choice to ensure widespread public involvement. The hybrid planning commission/CCI is an acceptable but less desirable choice. Finally, the least desirable option is having the governing body or the planning commission act as the CCI. It’s likely to work against citizen involvement and should be done only as a last resort” (CIAC, *Putting the People in Planning*, May 2008, pp. 8-9).

The City of Portland should strive to be a leader within Oregon, demonstrating best practices in the institutional design of its community involvement program.

- 4. Restore previous language applying the Comp Plan to “plans, policy, investment and development decisions” where it was replaced by “land use decisions” in the proposed draft.** PIAC is concerned about the nearly blanket change in "plans, policy, investment and development decisions" to "land use" because it seems to restrict the application of the Comprehensive Plan unnecessarily. The Comprehensive Plan applies to infrastructure projects, capital investment and development decisions, in addition to land use planning.

PIAC recommends that the previous language be restored throughout, or that the language be restored selectively to those policies that apply to “plans, policy, investment and development decisions” beyond land use alone. It is important to avoid the implication that the Comp Plan only applies narrowly to land use decisions and the work of the Bureau of Planning and Sustainability.

PIAC is tasked with recommending policies and practices to expand public involvement in city government. Even if the term is defined broadly, we are concerned that the use of “land use” alone could limit public involvement by creating the perception that the Comprehensive Plan does not apply to other kinds of government decisions. The issue of community perception, and its potential effect on community participation, is critical as you reexamine this language.

5. Add language to the chapter introduction referencing the celebrated history of Portland's neighborhood system. Our city's early commitment to community involvement in government is recognized internationally, and the neighborhood system has been central to that history. The January 2013 draft of Chapter 2 summarizes the evolution of the system and the continuing challenge to become even more inclusive. As we chart a course forward, PIAC believes it is appropriate to reference where we have been, and to reassure the community that the intent of the Comprehensive Plan is not to dismantle the neighborhood system.

Specifically, we recommend the following revisions to the proposed chapter introduction on page GP2-1 (new language in **bold**, most of which is taken from the previous draft of the Plan):

"The results are better — more durable, equitable and accountable — when a wide and diverse range of Portlanders are involved in the scoping, development and implementation of plans and investment projects. **No one person, agency, organization, or business can provide all the things Portland's diverse communities need.** Collaborative partnerships and inclusive community participation in land use decision making are essential to creating and sustaining a prosperous, healthy, equitable and resilient Portland.

Portland has a long history of community involvement that gained strength and power in the 1970s and forms the foundation of today's neighborhood system. As the city grows, diversifies, and works to advance equity, it is essential that all community members' needs and concerns are considered. Particular efforts must be made to improve services **and participation** for people of color, immigrants and refugee communities, people with disabilities, renters, low-income Portlanders, older adults, youth, and the lesbian, gay, bisexual, transgender and queer (LGBTQ) community. **A new paradigm of community involvement and engagement that supports intercultural organizing, recognizes that diversity is an advantage, and works to achieve equitable outcomes must be embraced and paired with Portland's neighborhood organizations to create a robust and inclusive community involvement system.**

It is the City's responsibility to promote deep and inclusive community involvement in land use decisions."

6. Additional Recommendations

- Remove “as appropriate” in policies 2.7, 2.25, 2.28 and 2.31.
- Direct bureaus to collect data regularly as an ongoing activity. This is implied by the policies on evaluating, sharing and using data (policies 2.7, 2.8, 2.19), but it is not stated explicitly. We recommend changing the first phrase in policy 2.8 to “Collect and evaluate data...” We also recommend changing the order of policies 2.7 and 2.8, and changing the title of policy 2.7 to “Community participation in data collection.”
- Revise policy 2.16 to emphasize two-way sharing of engagement methods. Add the phrase in **bold** to the proposed policy: “Coordinate and share methods, tools, and technologies that lead to successful engagement practices with both government and community partners, **and solicit engagement methods from the community.**”
- Define key terms from this chapter in the glossary: “accountability,” “engagement,” “accessible” and “community verified data.”

PIAC members thank you for your important work for the future of Portland, and we appreciate your consideration of our comments.

Sincerely,

Public Involvement Advisory Council
City of Portland

Attachment: List of PIAC Members

PIAC Members

Community Members

Claire Adamsick – NE neighborhood coordinator
Mohamed Ali – Immigrant & refugee service provider
Glenn Bridger – SW neighborhood activist
Baher Butti – Refugee case manager
Donita Fry – Native American Youth and Family Center
Greg Greenway – Public engagement consultant
Maryhelen Kincaid – North/NE neighborhood activist
Julio Maldonado – SE neighborhood and EPAP
Linda Nettekoven – SE neighborhood activist
Jessica Wade – Educator
Christine White – Port of Portland communications
Mark Wubbold – Policy analyst, Portland State University

City Staff Members

Kelly Ball – Office of Management & Finance
William Beamer – Bureau of Planning & Sustainability
Ross Caron – Bureau of Development Services
Michael Crebs – Police Bureau
Rhetta Drennan – Bureau of Environmental Services
Tim Hall – Water Bureau
Brian Hoop – Office of Neighborhood Involvement
Denver Igarta – Bureau of Transportation
Aaron Johnson – Fire & Rescue Bureau
Paul Leistner – Office of Neighborhood Involvement
Steve Pixley – Parks & Recreation Bureau
Jeff Selby – Office of Equity and Human Rights
Marty Stockton – Bureau of Planning & Sustainability