

Portland City Council Agenda
 Written Testimony - Item 1009/981

Agenda Item	Name or Organization	Position	Comments	Attachment	Created
981	Terry Harris	Oppose	<p>Again, I understand the urgency to get these codes revised before January 1st. But again, because of this hurried process, I object to significant substantive changes in the codes that are unrelated to the charter amendments. Such changes should be subject to their own legislative processes where the substance can be more completely examined in a public process.</p> <p>For example, unnecessary code changes in the Civic and Community Life chapter in Title 3 go far beyond mere update. (Indeed, cut-and-paste edits in the redline copy mistakenly included drafting notes that seem to indicate that a much broader re-write was (is?) contemplated.)</p> <p>Furthermore, I continue to object to blanket authorizations for administrative rulemakings without describing the scope or of the anticipated rules in the code sections that call for them. And this is *especially* true when the actual process for the administrative rulemaking is not yet in front of the council. (I am told the code for rulemaking will come to council in the revisions to Title 1 in the coming weeks. Notably, the code for Administrative *Appeals* remains a chapter in Title 3.)</p> <p>Finally, I'll make two recommendations for this council to consider to accompany the full collection of code edits you are processing:</p> <p>(1) THIS council should consider a separate code amendment (and maybe it's coming in Title 1?) that would be a basic catch-all provision on interpretation such that this set of code amendments would be understood primarily to effectuate the charter changes, and if ambiguities or omissions arise out of these revisions, the code should be interpreted in a manner consistent with that intent.</p> <p>(2) THIS council should consider, or recommend that the new council consider creation of a "Code Commission" to do the much more thorough review of the code (and these hurried revisions) for efficiency, consistency, accuracy and obsolescence that this council cannot do and the future council may not have the time to do any time soon.</p>	No	11/12/24 11:10 AM