

Comprehensive Plan Hearing - September 23, 2014
Testimony of Carol McCarthy

Hello, my name is Carol McCarthy and I live at 4311 SW Freeman Street in Portland.

I respectfully urge you to allow the public more time to review the 2035 Comprehensive Plan. The draft plan was released about 15 years behind schedule, so I do not see the merits in rushing the public comment period.

Goal #1 of Oregon's Statewide Planning Goals and Guidelines, adopted as OAR 660-015-0000(1), places primary importance on citizen involvement in the planning process and I think that the quality of this plan would be improved by extending the time for citizen review.

Citizen involvement is not adequately encouraged by the plan. When I searched the plan's 539 policies, I could not find even one mention of the word "citizen." Similarly, the role of the neighborhood associations is practically non-existent. The term "neighborhood association" occurs only once in policy 6.67.c and twice in conjunction with "business associations" in policies 2.1.b and 2.2. I do not feel this meets the state's goal of placing the highest priority on citizen involvement. I urge you to revise Chapter 2 to empower citizens and neighborhood associations to fulfill the state's goal that citizen involvement be the primary force in the planning process.

My overriding concern is that the goals and policies document should be more concisely written by removing the aspirational language. It is important that the plan include definitions for the guiding principles and that metrics be provided for each goal so that the effectiveness of the policies can be evaluated. I think that there should be an automatic and frequent review that results in the Comprehensive Plan being amended should the policies fall short of meeting the stated goal metrics.

Lack of clarity begins with the first policy, 1.1, which states the plan "includes the components listed below" rather than "is comprised of the component listed below." From the outset, the reader is uncertain whether they have been informed of the complete definition of the Comprehensive Plan. This type of confusion exists throughout the goals and policies. The wording is often ambiguous, non-specific, and uses terms that are not defined in the glossary. I think the complete document would benefit by allowing the public time to suggest revisions to the text.

The City's planning staff have been most responsive in providing data that we have requested to help us evaluate the Comprehensive Plan. However, due to the other demands on their time, we are still waiting for some of the data that we have requested to help us evaluate the assumptions in the growth projections and the implications of some of the new designations. We need time to evaluate the data and definitions once they are provided. Most importantly, we need these hearings to remain open for at least 90 days after the definitions for the mixed-use and campus-institutional zones have been provided.