



Bureau of Planning and Sustainability

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MEMO

DATE: January 14, 2014

TO: Planning and Sustainability Commission

FROM: Eric Engstrom, Principal Planner; Michelle Kunec-North, Program Coordinator

CC: Susan Anderson, Director; Joe Zehnder, Chief Planner

SUBJECT: **Balancing Decisions Using the Comprehensive Plan,
January 27 PSC Work Session**

Introduction

This report focuses on how decisions are made using the Comprehensive Plan, and staff-recommended changes to improve clarity of that process. This report is intended to inform the Planning and Sustainability Commission work session on January 27, 2015.

Testimony

Comments on the Proposed Draft Comprehensive Plan, including those from members of the public, City bureaus, and staff, identified a need for improved clarity regarding how the Plan is to be used in future decision-making. A variety of testimony questioned how different potentially conflicting policies might be balanced, how different verbs might impact that balancing, and what it means to comply with the plan or the guiding principles. Some testimony also illustrated a lack of consensus about what the plan can influence.

Discussion Issues

- A. **Scope of the Plan.** What types of decisions must comply with the Comprehensive Plan?
- B. **Compliance with the Plan.** What does it mean to comply with the Comprehensive Plan?
- C. **Guiding Principles.** How would one document compliance with the Guiding Principles?
- D. **Verbs.** How does the use of different verbs impact outcomes?
- E. **Organization.** Is the organizational structure of Chapter 10 as clear as possible?
- F. **Metrics.** Does the plan have numerical goals or targets?

Summary of Staff Recommendations

A Clarify the types of decisions that must comply with the Plan: Clarify that legislative and quasi-judicial amendments to elements of the Comprehensive Plan, certain supporting documents, and certain implementation tools must be in compliance with the Comprehensive Plan. *For more information, see Section A.*

B Define a standard for compliance: Clarify that compliance with the Comprehensive Plan means that “Amendments must be evaluated against the Comprehensive Plan’s Guiding Principles and applicable goals and policies and on balance be equally or more supportive of the Comprehensive Plan as a whole than the existing language or designation.” *For more information, see Section B.*

C Role of the Guiding Principles: Clarify that the Guiding Principles are applied to legislative amendments to the Plan elements, supporting documents, and implementation tools and that the Principles should be considered on balance. Create and maintain a separate guidance document that provides additional guidance on how to consider and make findings against the Guiding Principles. *For more information, see Section C.*

D Verbs: Add narrative language in the About the Plan section that describes how verbs are intended to be used in decision-making, in keeping with the “on balance” standard for compliance. *For more information, see Section D.*

E Organization of Chapters 1 and 10: Reorganize Chapters 1 and 10 to improve clarity and readability. As a result, Chapter 1 would focus on the Plan, its implementation and administration. Chapter 10 would focus on the Comprehensive Plan Map’s land use designations and application of zoning. *For more information, see Section E.*

F Metrics and Targets: Add more information to the plan describing specific numerical targets or goals. *For more information, see Section F.*

Note: Staff proposals regarding Proposed Draft **Policy 1.15 Relationship to community, area, and neighborhood plans** are scheduled for discussion during the February 24th Planning and Sustainability Commission work session. As such, this memo does not include proposals related to this policy.

Attachments

- A. Recommended Policy Changes

A. What types of decisions must comply with the Comprehensive Plan?

Background

The Proposed Draft generally asserts that amendments to the Comprehensive Plan’s elements, supporting documents, and certain implementation tools must comply with the Comprehensive Plan. However, the Proposed Draft is inconsistent and unclear about which specific types of amendments must comply.

Staff Proposal

1. **Types of decisions that must comply with the Plan:** Clarify that legislative and quasi-judicial amendments to elements of the Comprehensive Plan, certain supporting documents, and certain implementation tools, see Table 1, must be in compliance with the Comprehensive Plan.

Table 1. Types of amendments must comply with the Comprehensive Plan

Document	Amendment Type
Comprehensive Plan elements	
Goals and policies	Legislative
Comprehensive Plan Map	Legislative & Quasi-Judicial
List of Significant Projects	Legislative
Transportation System Plan components	Legislative
Supporting documents	
Supporting documents that contain policy decisions (e.g. Economic Opportunities Analysis, Public Facilities Plan, Transportation System Plan)	Legislative
Implementation tools	
Zoning Code	Legislative
Zoning Map	See below
Transportation System Plan components	Legislative
List of Significant Projects	Legislative
Service coordination agreements	Legislative
Annexations	Legislative
Urban renewal plans	Legislative
Development agreements	Legislative

2. **Zoning Map:** Clarify that legislative and quasi-judicial amendments to the Zoning Map are considered in compliance with the Comprehensive Plan if they are consistent with the Comprehensive Plan Map, see Policy 10.3. Such amendments are not required to separately document compliance with the Comprehensive Plan’s goals and policies as described for other implementation tools, because those findings will have been made in establishing the Comprehensive Plan Map.

B. What does it mean to comply with the Comprehensive Plan?

Background

The Proposed Draft Comprehensive Plan does not state what compliance with the Plan entails in a clear and consistent manner.

Staff Proposals

1. **Definition of “comply”:** Clarify that compliance with the Comprehensive Plan means that “Amendments must be evaluated against the applicable Comprehensive Plan goals and policies and on balance be equally or more supportive of the Comprehensive Plan as a whole than the existing language or designation.” This description is similar to the criterion currently applied to quasi-judicial Comprehensive Plan Map amendments, as defined in the Zoning Code Title 33.810.050 Approval Criteria. This language is used inconsistently in several policies.

Staff propose creating a new policy that a) states the types of amendments that must comply with the Comprehensive Plan and b) defines the standard for compliance, as noted above. Staff also propose adding narrative language to the About the Plan section (e.g. section beginning on page A-4) that describes the “on balance” standard for compliance.

2. **Definition of “consistent with”:** Goals and policies throughout the Plan use the verb “consistent with”. For example, Policy 1.5 states “Ensure that the Comprehensive Plan is consistent with all applicable state and federal regulations...” Clarify that in these cases, “consistent with” means that the subject meets the requirements of, satisfies, or adheres to the regulation, mandate, or plan listed in the goal or policy.

Staff propose amending relevant policies and adding a definition of “consistent with” to the glossary.

C. Compliance with the Guiding Principles

Background

The Guiding Principles are intended to reflect 1) key priorities that carry the Portland Plan and Climate Action Plan forward into the Comprehensive Plan; 2) big-picture, multi-objective intentions that guided the development of the Plan; and 3) a framework for the future implementation and administration of the Plan. However, the Proposed Draft lacks clarity on the role of the Guiding Principles in the implementation of the Plan.

Staff Proposals

1. **Application:** The Guiding Principles are applicable to legislative decisions that must comply with the Comprehensive Plan applies (i.e. amendments to elements, certain supporting documents, and certain implementation tools, per Section A of this report). The Guiding Principles should be considered on balance with other applicable goals and policies, as described in Section B of this report.

Staff propose adding a new policy that directs the application of the Guiding Principles to legislative amendments that must comply with the Comprehensive Plan, on balance with other applicable goals and policies.

2. **Integration into the Plan:** Staff recommend moving the descriptions of the Guiding Principles, currently found at the beginning of Chapter 1, to the Vision statement, to clarify that they are neither goals nor policy. This may require modifications to the Vision statement to reduce redundancy.

In addition, staff recommend calling out the Vision and Guiding Principles as an element of the Comprehensive Plan in Policy 1.1.

3. **Implementation guidance:** As the Guiding Principles are more broadly defined than Comprehensive Plan policies, making findings against the Principles may require a different process and level of detail. Findings against the Guiding Principles are intended to support transparency and multi-objective decision-making, but not to be so cumbersome as to prevent progress in reaching the goals of the Plan.

Staff recognize the need for additional guidance on how to make findings against the Guiding Principles – particularly related to topics that have not traditionally been as well integrated into the plan – such as health, equity, and resilience. Such guidance would provide additional clarity and transparency regarding the factors considered to the public, the Planning and Sustainability Commission, and City Council. This guidance is likely to vary based on the type and scale of decision and will change over time, as planners' capacity to understand, consider, and make findings against the Guiding Principles improves over time.

As such, staff recommend maintaining a separate guidance document that describes how to consider and make findings against the Guiding Principles. This document would be available to the public, but not adopted as part of the Comprehensive Plan to allow flexibility in application over time.

4. **Environmental Justice:** The Proposed Draft includes detailed environmental justice policy and criteria in Chapter 10, related to amendments to the Comprehensive Plan, Comprehensive Plan Map, and Zoning Code. To elevate the importance of environmental justice and reduce redundancy, staff propose:
 - a. Integrating environmental justice into the Equity Guiding Principle,
 - b. Creating a new Environmental Justice policy in the Plan that includes the details currently included in Policies 10.1, 10.2, and 10.4, and applies to legislative Comprehensive Plan decisions, and
 - c. Providing additional guidance regarding how to identify and describe environmental justice impacts in the guidance document described in staff proposal #3 above.

D. Use of policy verbs in decision-making

Background

In the development of the Plan, staff attempted to use a consistent set of active verbs for each policy statement. The majority of policies include such verbs, which are defined in the glossary. Certain verbs reflect a strong action for which the City and its Comprehensive Plan have defined control (e.g. require, protect, provide, prevent, limit). Others reflect actions for which the City and the Comprehensive Plan may have less direct control (e.g. encourage, foster, and coordinate).

In general, staff did not intend to create a ‘hierarchy’ of verbs. However, some verbs, based on their definition, may imply a hierarchy. For example, ‘limit’ is defined as minimizing something or its effects while ‘prevent’ is defined as not allowing/prohibiting something.

Related testimony

Members of the public and staff have expressed concerns with verb choice in the Economic Prosperity and the Environment and Watershed Health chapters. Environmental representatives have asked for stronger protection verbs and are concerned that without them industrial policies will always trump environmental policies. Industry representatives have also asked for stronger verbs and questioned the land supply impact and cost of many of the environmental policies, and are concerned that the policies will further reduce industrial land supply and negatively affect jobs.

Staff Proposals

1. **Verb choice:** A verb’s appropriateness for any given policy should be determined by the definition of that verb, as defined in the glossary, and the intent of the policy.
2. **Use of verbs in decision-making:** In accordance with the compliance standard established in Section B, City Council has the ability and authority to balance applicable policies in individual decisions. While verbs denote a certain level and type of application based on their use and definition, the whole of the intent of all relevant policies should be considered on balance when making decisions using the Comprehensive Plan (see Sections A and B of this report). Regardless of the verb used, no goals or policies are truly mandatory and policies should not be considered akin to approval criteria.

An exception is when policies have been implemented through binding regulations in an implementation tool, such as the Zoning Code. In such cases, making decisions that run contrary to a binding regulation would require an amendment to the regulation itself.

As a matter of practice, staff proposals for decisions that must comply with the Comprehensive Plan should take policy verbs into account when making findings against relevant goals and policies. Staff propose adding narrative language in the About the Plan section (e.g. section beginning on page A-4) that describes for the public, staff, and decision makers how verbs are intended to be used in decision-making, in keeping with the “on balance” standard for compliance, see also Section B, staff proposal #1.

E. Organization of Chapters 1 and 10

Background

Chapters 1 and 10 of the Proposed Draft generally describe the elements of the Plan and how the Plan is implemented and administered. However, the distinction between the chapters is indistinct, resulting in both repetition and gaps in the policy structure. In addition, the Administration section of Chapter 10 is lengthy, repetitive, and lacks consistent treatment across various types of amendments.

Staff Proposal

Staff propose reorganizing Chapters 1 and 10 to improve clarity and readability. The net result of the proposals below is a Chapter 1 that focuses on the Plan, its implementation and administration; and a Chapter 10 that focuses on the Comprehensive Plan Map's land use designations and application of zoning.

1. **Chapter 1 reorganization:** Reorganize Chapter 1 to include sections related to the a) Plan and its supporting documents, b) implementation tools, and c) administration of the Plan.
2. **Elements of the Comprehensive Plan:** To improve clarity and readability, refer to the adopted components of the Comprehensive Plan as "elements" of the Plan. These elements include those listed in Policy 1.1.
3. **Implementation tools:** The Implementation section of the Proposed Draft Chapter 1 contains policies for only a subset of tools. Amend the Implementation section in Chapter 1 to include a policy for each type of implementation tool.
4. **Administration:** The changes outlined below would improve the clarity of administration policies.
 - a. Move the Administration section from Chapter 10 to Chapter 1. Edit to remove redundancy and improve clarity of the narrative introduction and policy language.
 - b. Create one set of general policies that apply broadly to Comp Plan amendments. Amend policies as needed to describe both the necessary considerations and procedural aspects for amendments.
 - c. Remove amendment policy guidance that is now covered by these general policies from other policies in Chapters 1 and 10 to eliminate redundancies.
5. **Chapter 10 reorganization:** Restructure Chapter 10 to relate only to the Comprehensive Plan Map and Zoning. The chapter would include policies specific to Comprehensive Plan Map land use designations and amendments to the zoning map and code.

F. Metrics and Targets

Background

There was some testimony requesting the addition of more measurable metrics or goals to the plan. In fact, City Council already adopted “measures of success” with the Portland Plan in 2012. In addition, some of those measures were incorporated into the Growth Scenario Report in 2013, to provide a means to compare potential outcomes from different growth strategies.

The City’s state-approved Periodic Review work plan requires that the City identify measurable evaluation criteria to assess the consequences of different land use choices as we adopt the plan. The measures incorporated into the 2013 Growth Scenarios Report serve this purpose. The metrics in this report were derived from the adopted Portland Plan measures of success – with an emphasis on measures related to the physical form of the city. The Commission will consider an updated version of the Growth Scenario Report in March 2015. That update will incorporate results from transportation modelling, and will compare expected outcomes from the Proposed Plan with the other scenarios considered in 2013.

The measures adopted with the Portland Plan and incorporated into the Growth Scenarios Report are summarized below:

Portland Plan (Council Adopted)	Growth Scenarios Report
Equity and Inclusion <ul style="list-style-type: none"> - Income distribution - Diversity 	Risk of displacement and gentrification
Resident Satisfaction <ul style="list-style-type: none"> - % Satisfied living in city 	NA
Educated Youth <ul style="list-style-type: none"> - On-time graduation rates 	NA
Prosperous households <ul style="list-style-type: none"> - % above self-sufficiency income level 	Housing mix and affordability Residential land supply/capacity (details in the Housing Needs Assessment Report)
Growing Business <ul style="list-style-type: none"> - Export value, city rank 	Employment land supply/capacity (details in the Economic Opportunities Analysis Report)
Number of jobs	Access to family wage jobs
Transit and Active Transportation <ul style="list-style-type: none"> - % who take transit, walk, or bike to work 	Access to frequent transit Access to low stress bikeways Mode share
Reduced Carbon Emissions <ul style="list-style-type: none"> - % below 1990 levels 	Greenhouse gas emissions Vehicle miles travelled

Portland Plan (Council Adopted)	Growth Scenarios Report
Complete Neighborhoods <ul style="list-style-type: none"> - Complete neighborhoods index - Access to healthy food - Access to parks 	Complete neighborhoods index Access to parks
Healthier People <ul style="list-style-type: none"> - Adults at a healthy weight - 8th graders at healthy weight 	NA
Safer City <ul style="list-style-type: none"> - % of people who feel safe walking in their neighborhood at night - Part 1 crimes per 1000 	NA
Healthy Watersheds <ul style="list-style-type: none"> - Water quality index - Tree canopy 	Tree canopy Watershed health

Goals and Policies

In addition to these metrics, there are several policies within the Proposed Plan with specific numerical goals. These are:

Policy 3.2 – Growth and Stability. Directs a majority of growth to centers and corridors.

Policy 3.27 – Housing in Town Centers. Establishes policy that there should be zoning capacity for 7,000 households within half-mile of a Town Center.

Policy 3.31 – Housing in Neighborhood Centers. Establishes policy that there should be zoning capacity for 3,500 households within half-mile of a Neighborhood Center.

Goal 5D – Affordable Housing. Refers to supply of affordable units. The Housing Needs Assessment contains specific numbers of projected new households at different affordability levels.

Policy 5.1 – Housing Supply. This policy directs us to maintain capacity for the projected 122,000 new households by 2035.

Policy 5.2 – Housing growth. This policy refers to capturing 25% of the regions 7-county household growth.

Goal 6B – Development. This goal is linked to the Employment Opportunities Analysis, which projects 140,000 new jobs by 2035.

Policy 6.2 - Employment Growth. This policy refers to capturing 25% of the regions 7-county job growth.

Policy 6.12 – Land Supply. This goal is linked to the Employment Opportunities Analysis, which projects 140,000 new jobs by 2035.

Policy 6.17 – Short Term Land Supply. This goal is linked to the Employment Opportunities Analysis, which projects short term land supply needs for employment growth.

Goal 7A – Carbon Emissions. This goal is linked to the Climate Action Plan goal of reducing emissions 50% below 1990 levels. A number of other transportation and building related policies help implement this goal.

Goal 9G – Safety. This transportation goal refers to achieving zero traffic-related fatalities or serious injuries.

Policy 9.5 – Mode Share and VMT. This policy is linked to Climate Action Plan and Metro 2040 Regional targets related to transportation mode and reduction of vehicle miles travelled. These plans contain specific numerical targets.

Staff Proposal

1. **Add a metrics page.** Promote stronger accountability by including the above information in an additional section located in the “About the Plan” chapter.

Recommended Policy Changes

This list is presented as a consent list. Individual items would not be discussed in Commission, except where noted. Commissioners should identify any other items they would like to discuss by emailing staff by the end of day on the Friday prior to the commission work session.

Note: Under the “Discuss” column staff has indicated with a check mark which issues they recommend for discussion. Please add check marks in the boxes of any additional issues you wish to discuss.

Reference number	Issue	Who testified	Recommendation	Rationale	Discuss?
General, Intro, Vision, About the Plan					
1	Terminology	Staff	Use the term Comprehensive Plan “elements” consistently to refer to the adopted parts of the Plan, as listed in Policy 1.1	Clarity	<input type="checkbox"/>
2	Terminology	Staff	Use the term “implementation <u>tools</u> ” (rather than “implementation measures/actions/etc.) consistently to refer to tools covered by Policy 1.8.	Clarity	<input type="checkbox"/>
3	Intro, I-4	Staff	Add Vision and Guiding Principles as an element of the Plan (page I-4 and 1-1)	Clarity – ensure it is clear that the vision statement is an element of the plan.	<input checked="" type="checkbox"/>
4	Vision Statement	Staff, BDS	Integrate Guiding Principles into the Vision statement, remove from page GP1-5.	They are not policies, but function more like and element of the vision statement.	<input checked="" type="checkbox"/>
5	Guiding Principles	Staff	Amend Equity Guiding Principle to “... <u>promote equity and environmental justice</u> by reducing existing disparities...”	Strengthening this statement because we propose to remove the many separate references now in chapter 10.	<input checked="" type="checkbox"/>
6	Guiding Principles	Audubon	Integrate a reference to “fish and wildlife”	Describes a more complete principle.	<input type="checkbox"/>

Reference number	Issue	Who testified	Recommendation	Rationale	Discuss?
7	Guiding Principles	Audubon, Houck	Clarify to state intent to reduce risk/impacts of hazards, climate change and economic shifts; and improve ability to withstand/adapt/recover from these impacts.	Clarity	<input type="checkbox"/>
8	About the Plan	Staff, BDS, PBOT	Add narrative language that describes the types of amendments that must comply with the Plan and the “on balance” standard for compliance.	Clarity	<input checked="" type="checkbox"/>
9	About the Plan	Staff	Add a new section describing, identifying the measures of success, and related numerical goals/metrics.	Promote accountability, stronger connection to the Portland Plan.	<input checked="" type="checkbox"/>
10	Chapter Title	Staff	Update title of chapter, the What is this chapter about?, Why is this important?, and Table of Contents sections to reflect the new content of the chapter.	Related to other changes below.	<input type="checkbox"/>
Chapter 1 Goals and Policies					
11	Goal 1A	Staff	Re-title as “Multiple objectives”	Clarity, consistent with moving Guiding Principles into Vision Statement.	<input type="checkbox"/>
12	Goal 1D	Staff	Delete final sentence.	Reflects proposed reorganization.	<input type="checkbox"/>
13	New Goal	Staff	Insert Goal 10.A	See below.	<input type="checkbox"/>
14	Policy 1.1	Staff	Move policy language beginning with, “Future work...” through the end of the policy to the narrative introduction to the Administration section	Clarity	<input type="checkbox"/>
15	Policy 1.1	Staff	Include the Vision and Guiding Principles as an element of the Plan	Clarity, consistent with moving Guiding Principles into Vision Statement.	<input type="checkbox"/>
16	Policy 1.1	Staff	Amend policy to clarify that the Comprehensive Plan Map designates desired land uses, as the Zoning Map designates allowed uses.	Reference to Chapter 10 detail.	<input type="checkbox"/>

Reference number	Issue	Who testified	Recommendation	Rationale	Discuss?
17	Policy 1.1	Staff	Amend definition of the List of Significant Projects to clarify that the plan identifies the “long-term public facility projects”	Consistency of language with CSP.	<input type="checkbox"/>
18	New Policy	Staff	Add policy that more clearly identifies the role of the Planning and Sustainability Commission. Ensure the PSC reviews and makes recommendations to City Council on all proposed legislative amendments to the Comprehensive plan elements, supporting documents, and implementation tools.	Policy Gap.	<input type="checkbox"/>
19	Policy 1.2	Staff	Amend to “... used to develop Comprehensive Plan goals and policies...”.	Supporting documents are used to develop all elements of the Plan, not just the goals and policies.	<input type="checkbox"/>
20	Policies 1.1 and 1.2	PBOT	Revise language to more clearly communicate which elements of the TSP are part of the plan, which are supporting documents, and which are implementation tools.	Clarity, consistency with legal status of TSP elements. The TSP document includes elements that fit into each of these sections.	<input type="checkbox"/>
21	Policy 1.3	Staff	Replace “components” with “elements”.	Consistency	<input type="checkbox"/>
22	Policies 1.3 - 1.6	Staff	Move to new Administration section.	See below	<input type="checkbox"/>
23	Retitle Intro, GP 1-7	Staff	Retitle this section as “Implementation tools’	Consistency	<input type="checkbox"/>
24	Policy 1.8	Staff	Amend policy to follow format of other policies (beginning with an active verb) and use “comply”, i.e. “Maintain Comprehensive Plan implementation tools that are derived from and in compliance with the Comprehensive Plan...”	Clarity	<input type="checkbox"/>

Reference number	Issue	Who testified	Recommendation	Rationale	Discuss?
25	Policy 1.8	Staff	Delete list of implementation tools (bullets) and add policy reference to other policies within the section that list and describe implementation tools.	Clarity	<input type="checkbox"/>
26	Policy 1.9	Staff	Move to Chapter 8. Public Facilities and Services	This is more about services than it is about the plan itself.	<input type="checkbox"/>
27	Policy 1.10	Staff	Move to Administration section	Clarity	<input type="checkbox"/>
28	Policy 1.12	Staff	Delete Policy	Covered by Policy 1.1	<input type="checkbox"/>
29	Policy 1.14	Staff	Rephrase policy to clarify that ordinances which adopt urban renewal plans or change their boundaries are considered Comprehensive Plan implementation tools.	Clarity	<input type="checkbox"/>
30	Policies 1.11, 1.12, 1.14	Staff	Delete “comply means” policy guidance regarding amendments to Comprehensive Plan elements, supporting documents and tools in Policy 1.11, 1.12, and 1.14. Move guidance to a new policy in the Administration section, see item #41.	Avoid duplication	<input type="checkbox"/>
31	New Policy	Staff	Add new Zoning Code and Map policies in the Implementation tools section	Policy Gap – this section should identify each tool.	<input type="checkbox"/>
32	New Policy	Staff	Add a new Transportation System Plan components policy in the Implementation tools section that defines which TSP components are considered implementation tools and their intent.	Policy Gap – this section should identify each tool.	<input type="checkbox"/>
33	New Policy	Staff	Add a new Development agreements policy in the Implementation tools section. Clarify that only those development agreements described in ORS 94.504 to 94.528 are considered implementation tools of the Comprehensive Plan.	Policy Gap – this section should identify each tool. Not all development agreements are subject to the Comprehensive Plan – there is state statute that governs this.	<input type="checkbox"/>

Reference number	Issue	Who testified	Recommendation	Rationale	Discuss?
34	New Section	Staff	Create a new Administration section in Chapter 1, to combine related policies from Proposed Draft Chapters 1 and 10. Move narrative from Chapter 10 Administration to section.	Clarity. Puts like policies in one place.	<input type="checkbox"/>
35	New Section	Staff	Move Policies 1.3 through 1.6, 1.10, 10.2 to section.	Clarity	<input type="checkbox"/>
36	New Policy	Staff	Add new Consistency with Statewide Planning Goals policy. Clarify that the Comprehensive Plan, supporting documents and implementation tools must be consistent with the Statewide Planning Tools.	Policy Gap, clarity.	<input type="checkbox"/>
37	New Policy	Staff	Add new Compliance with the Comprehensive Plan policy that describes what types of amendments must comply with the Comprehensive Plan and defines the on-balance standard for determining compliance. Clarify that amendments to the Zoning Map are in compliance with the Comprehensive Plan if they are consistent with the Comprehensive Plan Map.	Clarity. Avoid duplication.	<input checked="" type="checkbox"/>
38	New Policy	Staff	Add new Compliance with the Guiding Principles policy that directs the application of the Guiding Principles to legislative amendments that must comply with the Comprehensive Plan, on balance with other applicable goals and policies.	Clarity. Consistent with moving Guiding Principles into Vision Statement.	<input checked="" type="checkbox"/>
39	Figure 1.1	Staff	Update figure to be consistent with changes to Comprehensive Plan elements and Implementation tools described in this memo	Consistency	<input type="checkbox"/>
40	Figure 1.1	Parks and Recreation, Staff	Amend "Parks" to "Parks & Recreation"; "Trails" to "Natural Areas and Urban Forest"; and "Civic Facilities" to "Other essential facilities"	Clarity	<input type="checkbox"/>
Chapter 10 – Introduction, Goals and Policy					
41	Title, Introduction	Staff	Update title of chapter, the What is this chapter about?, Why is this important?, and Table of Contents sections to reflect the new content of the chapter	Consistency with reorganizations noted above.	<input type="checkbox"/>

Reference number	Issue	Who testified	Recommendation	Rationale	Discuss?
42	Goal 10.A	Staff	Move to Chapter 1. Replace with language that describes the policy aspiration of the Administration section.	See above.	<input type="checkbox"/>
43	New Policy	Staff	Create a new Environmental Justice policy in the Plan based on the bullets included in Policy 10.1, 10.2, and 10.4. Move policy to a more appropriate location in the Plan. Amend policy language to include the concept of “equitable community benefits”.	Avoid duplication.	<input checked="" type="checkbox"/>
44	Policies 10.1 and 10.2	Staff	Move to Chapter 1. See above. Refine format to avoid long lists of un-numbered bullets. Delete components covered by general policies in new section.	See above	<input type="checkbox"/>
45	Policy 10.2.a	Staff	Move to a new policy “Changes to the Zoning Map as a result of Comprehensive Plan Map amendments”. Delete statement regarding PSC review. Move statement regarding Hearings Officer review to Policy 10.2.	Clarity	<input type="checkbox"/>
46	Policy 10.2.a	Staff, BDS	Clarify that CP Map Amendments processed through quasi-judicial review do not need to make findings on the Guiding Principles (note that this sub policy will be moved to Chapter 1 per above).	Burden of proof would be very difficult to meet given limited timeframe of quasi-judicial review. Staff recommends limiting these kind of findings to legislative actions.	<input checked="" type="checkbox"/>
47	Policy 10.4	Staff	Delete portions covered by policies described in new Administration section (see item above) and Environmental Justice staff proposal (see Section C, proposal #4).	Clarity	<input checked="" type="checkbox"/>
48	New Section	Staff	Create a new section after Land Use Designations for Amendments to the Zoning Map and Zoning Code. Insert narrative. Move Policies 10.2.a, 10.3, and 10.4 to new section.	Clarity	<input type="checkbox"/>
49	Policy 10.3.b	Staff	Replace “in compliance with” with “consistent with”. Coordinate edits to this policy and the Zoning Code so that language is not duplicative, and the Comp Plan	Clarity	<input type="checkbox"/>

Reference number	Issue	Who testified	Recommendation	Rationale	Discuss?
			Policy provides general guidance to the specific Criteria in the Zoning Code.		
50	Policy 10.5	Staff	Consider reference to describe how Comprehensive Plan designations are also noted on Zoning Maps using ().	Clarity	<input type="checkbox"/>
Glossary					
51	New Term	Staff	Add "consistent with" to glossary.	Clarity	<input type="checkbox"/>
52	New Term		Add "prohibit" to the glossary.	Clarity	<input type="checkbox"/>
53	New Term	Many stakeholders	Consider revising glossary definition of "encourage" to indicate that implementation could include a range of regulatory and non-regulatory approaches. Many testifiers on a range of topics have requested stronger language than "encourage," usually requesting "require". Assumptions seem to be that "encourage" means that the City will not implement through requirements/regulations.	Many readers have interpreted "encourage" to mean non-regulatory. Regulations may be one way to encourage.	<input type="checkbox"/>
54	Many policies	Staff	Identify the places in the plan where we use the term "evaluate" and consider if there is more direct terminology.	We may have over- used the term evaluate in place of a more direct verb.	<input type="checkbox"/>
55	Refine Term	Staff, PBOT	Refine "plans and investments" definition to include the TSP explicitly, and review the use of that term throughout the plan.	Consistency. There may be locations where we should have used the term but did not.	<input type="checkbox"/>