

MEMORANDUM

Date June 25, 2013

To Portland Bureau of Planning and Sustainability - Comprehensive Plan Management Team

From Community Involvement PEG staff team: Marty Stockton, Paul Leistner, Deb Meihoff (Communitas)

Re **Summary Report of the CI PEG** Comprehensive Plan Working Draft Feedback and Next Steps for Implementation

This memorandum presents a summary of recommendations on how to improve the City's approach to community involvement under the Comprehensive Plan, as developed by the Community Involvement Policy Expert Group (CI PEG). It includes suggested revisions to goals and policies policy and the key elements to affect change in community involvement practices. The memo is a supplement, not replacement, of the full compendium of CI PEG meeting summaries.

The work of the CI PEG was entered into with a commitment to changing the way the City performs community involvement under the Comprehensive Plan, making it more effective and efficient for community members and staff alike. The ideas for change - some encompassed in the current Working Draft (January 2013) and others outlined herein - reflect the City's adopted Public Involvement Principles, CI PEG members' ideas, best practices as derived from a literature review and member experiences, and issues surfaced in the Community Involvement survey administered by the CI PEG. Additionally, the CI PEG has made recommendations for an overhauled Community Involvement Manual that describes how to apply the goals and policies to the community involvement work of the Comprehensive Plan.

It is the expectation of CI PEG members that this new body of goals and policies, along with the accompanying and updated Community Involvement Manual, will result in a real change to the way land use and development planning processes are conducted in Portland. Critical to realizing true change within community processes are the new ideas and language about how we define community, how we conduct our work, and how we learn from our experiences with a constant dedication to ongoing improvement.

What follows is a summary of the key elements of the new involvement approach, summary of information used for CI PEG discussions, advice on amendments to the Comprehensive Plan Update Working Draft Part 1, and ideas about next steps for implementation.

Key Elements to CI Improvements

Underpinning the CI PEG's policy suggestions are the following key elements to improving the way Portland communities are involved in land use planning and development:

Alignment with adopted Public Involvement Principles. The City of Portland is fortunate to have an existing body that oversees community involvement citywide - the Public Involvement Advisory Council (PIAC). Since the Comprehensive Plan was last updated, the PIAC developed a set of Public Involvement Principles, vetted with a broad cross-section of the community and adopted by City Council in 2010. The principles are the foundation of CI PEG discussions and proposed changes to the Working Draft.

Ongoing Community Involvement Program. The City is required to develop and maintain a Community Involvement Program, which includes goals, policies, a manual and a body to oversee implementation of the program. Some concepts and best practices are not appropriate for inclusion in the adopted goals and policies document, but are better suited for a Community Involvement Manual. The CI PEG views the Manual as an opportunity to develop a contemporary and usable how-to guide for City staff to follow with a dedicated oversight body that has the time and diverse skills necessary to provide accountability and to keep the practices current. The Planning and Sustainability Commission currently serves as the oversight body. In the review of the Equity Technical Memo of the Working Draft, as well as experiences of other communities and those outlined in the Oregon's citizen involvement guide to implementing Planning Goal 1 (see resource citations in the bibliography, Appendix B), the CI PEG has noted that recommended best practice is to establish an oversight body distinct from the Planning and Sustainability Commission. The CI PEG recommends the City reconsider the most appropriate oversight body for implementation of the Comprehensive Plan's community involvement program. The PEG has reached consensus that this role requires skills, knowledge, and support of a specially-appointed body, but they have not reached conclusion as to the best structure for the recommendation.

Inclusive and tailored processes. The CI PEG recommendations are focused on ensuring the communities involved in planning and development processes are inclusive of all Portlanders and the work is done in a way that allows for the different ways Portlanders socialize and organize. The CI PEG recommends the City use demographic data in order to design appropriate public processes with and for potentially affected individuals and communities. The data should also be used to track progress and implement improvements to expand the breadth and depth of Portlanders who are involved in decision making processes.

Integrated community involvement. In the past the Community Involvement chapter of the Comprehensive Plan has stood alone, essentially unlinked to the other Comprehensive Plan elements. This memo outlines many ideas the CI PEG has for bringing together the physical planning elements (what we are planning for) with community involvement processes (how we are planning and developing). The integration reflects better the purpose for

community involvement - not a function in and of itself, but processes seeking better ideas and community problem-solving for how we physically grow and change.

Acknowledge different needs for ongoing and project-specific community

involvement. Through the course of reviewing the Working Draft, the CI PEG identified the need to have policies that are specific to developing and maintaining a healthy, ongoing community involvement program under the Comprehensive Plan, as well as policy guidance for how community involvement should take place for specific projects. As such, the CI PEG suggests revising Chapter 1 to organize policies that apply to ‘ongoing’ program support and those that apply to ‘project-specific’ community involvement.

Open and transparent government. At the core of the CI PEG’s ideas for revisions is the City’s collective commitment to open and transparent government. The policy improvements outlined herein seek to further this goal by clearly articulating how and when planning and development decisions are made and the community’s role in the processes.

Building capacity for better involvement. The CI PEG has outlined a set of policies related to ‘ongoing’ practices that are intended to build on community wisdom, build up community knowledge, and improve staff capacity to effectively work for an increasingly diverse and growing Portland. Ultimately, all Portlanders will have equitable access to communications, information, and the planning and development processes.

Innovation and best practices. Much has changed in Portland over the past 30 years, physically and demographically. And often, staff have responded with new or better ways to engage communities than ever envisioned under the current Comprehensive Plan. However, the current plan does not acknowledge or challenge staff to evaluate and continue this evolution. The lack of policy direction has led to inconsistent quality of City processes and confused expectations. The CI PEG’s ideas incorporate proven best practices in the community involvement field and also point the way to continual evaluation and improvement.

Sources of Information

The CI PEG considered many pieces of information in its formation and discussion of potential policy revisions. Many of the concepts from research and community dialogue have been included in the Working Draft. However, there are some elements that the Working Draft has not completely incorporated. Below is a summary of the primary sources of information used by the PEG that still need to be integrated into the Working Draft; these include concepts from community input including the work of the Public Involvement Advisory Council’s Comprehensive Plan Work Group, best practices literature review, and an equity and community involvement gap analysis of the Working Draft.

Community Input

To supplement PEG member's input, a broader public was invited to participate in a CI PEG survey about community experiences in land use and development processes, and BPS hosted multiple public workshops around the city. When available, the CI PEG used this information in its discussions and to form policy feedback earlier in the process. However, the survey and public workshop results were not available prior to release of the Working Draft. The CI PEG has considered these new pieces of public feedback in forming its suggestions for policy revision (outlined in Appendix A). There is more work to be done; PEG members request BPS staff consider the key findings below in concert with the PEG's ideas for Working Draft revisions.

Key Findings - CI PEG Survey and Public Workshops

As a whole community comments focused on accountability, transparency, broad and effective outreach, improving accessibility of information, and notice and review of by-right projects. These comments were grouped into ongoing community involvement efforts and involvement within a specific project. There appears to be overall support for many community involvement policies, but a general concern with how these policies fit with the rest of the Comprehensive Plan. Following are the high level community involvement themes gathered from the public survey and workshops:

- **Integration of community involvement with the rest of the Comprehensive Plan chapters.** Expand on the policies that describe the purpose and implementation of the Community Involvement Program.
- **Broaden involvement.** Multiple comments expressed the need to improve outreach to disproportionately-impacted groups, especially communities of color and people who are low income. Involvement needs to include and, in addition, be expanded beyond neighborhood associations in all processes/projects that affect groups and individuals.
- **Acknowledgement and support of our civic infrastructure.** Many comments identified a gap in acknowledging the "civic infrastructure" - the neighborhoods, nonprofits and other civic organizations that routinely and actively participate in the creation and implementation of City policies. Support includes capacity building, financial and other resources.
- **Authentic involvement.** Many comments emphasized that processes should be genuine and not for show. City staff need to listen and then act. Community input should have an impact and lead to results.
- **Improvement of the notification system.** Many comments identified the need to improve the system of both informal and formal notification to use more innovative communication tools and strategies. Content needs to be easy to understand and must include relevant information to affected and interested community members, with enough lead time to allow them to respond effectively.

- **Build capacity within City government.** Feedback called for providing professional development opportunities to ensure that City staff have the skills and experience needed to design and implement processes that engage a broad diversity of affected and interested communities, including historically underrepresented groups.
- **Build capacity with the community.** Several comments called for strengthening community capacity to participate effectively with education efforts on both the content and process and how these tie to overarching policy, planning principles and conversation.
- **Process documentation.** Several comments highlighted the need for and/or improvement to community involvement processes and community input to be documented, preserved and that the public has easy access to information about what happened during processes.

Best Practices Research

Multiple reports, articles, and documents were used in preparation of CI PEG discussions. These included the Portland Public Involvement Principles, California Institute for Local Government Public Engagement Principles, a paper titled “Deterring Fake Participation”, the American Institute of Certified Planners Code of Ethics, and City of Portland’s Title VI Program, among others (find complete list in Appendix B Best Practices Resource Bibliography). Many, but not all, of the ideals and best practices in the literature are incorporated into the Working Draft. Key concepts that are not adequately addressed in the draft are highlighted in the ideas for revisions, Appendix A.

Equity and CI Review of Chapters 2-8

The CI PEG performed a review and discussion of how Chapters 2 through 8 integrate, duplicate, or conflict with the goals and policies established in Chapter 1. The CI PEG also used the bureau’s Equity Technical Memo of the Working Draft as an added screen to building its suggested revisions. A full compilation of CI PEG member’s Equity and Community Involvement review is contained in notes from the April 18 CI PEG meeting. Highlights include:

- **Introduction** carries many meaningful goals related to community involvement and equity. It would be helpful to add goal language acknowledging the community role of defining the local context / experience, not just demographic data. Terms and linkages of gentrification need to be more deliberate and descriptive of the relationships. The language around gentrification should be more intentional - “Economic displacement” is a commonly used term that is more specific to the meaning of gentrification in this context.

- **Chapter 2 Housing** The Housing chapter has many policies that will further equitable access throughout the city. There is also strong language to support community involvement when prioritizing investments and creating redevelopment plans. The chapter could be strengthened by adding language to encourage community dialogue early in processes and with diverse communities, especially for projects or programs delivered in areas where current residents may not be aware of or prepared for change and also with residents in need of more affordable housing.
- **Chapter 3 Economic Development** has many supportive policies tying residents and good process to businesses, such as Policy 3.49 that encourages timely communication between institutions and communities, and Policy 3.58.b supporting cooperation and partnerships between public and private entities for economic vitality in disconnected communities.
- **Chapter 4 Watershed Health and Environment** generally does not integrate adequate equity or community involvement goals. For instance, Chapter 4 does not address the human relationship with nature; therefore the role of diverse populations in guiding growth in harmony with the natural environment is not addressed. Also, there is a goal related to Social Justice, but no corresponding policy to address the goal.
- **Chapter 5 Urban Design and Development** contains many policies that address the need for gathering places, equitable access to services and amenities, and the role of community in developing citywide and neighborhood plans for change. There are minor modifications that could improve this chapter's connection to equitable economic endeavors and opportunities for diverse communities, as well as clarifying how and when community members will be involved with policy, design, and development decisions over time. There is good commentary in the Working Draft around community involvement that did not necessarily translate into the policy language. However, as with other chapters, there is no indication as to how conflicts in the aspirations espoused by the various goals/policies should be resolved – e.g., what happens when part of the community wants to “innovate” and part wants to “maintain” existing neighborhood characteristics?
- **Chapter 6 Public Facilities** in general have many policies supportive of equitable access for diverse communities and human interface with public facilities. However, some of these policies are weakened by the verbiage of the subpolicies. Furthermore, community involvement is not integrated into much of the chapter - there is no link made between Chapter 1 Community Involvement and the various public facilities plans. As with Chapter 7, the community's role is missing from developing capital improvement plans and annual project prioritization.
- **Chapter 7 Transportation** does a good job of incorporating health and equity goals for our diverse population. There are a few areas that, if modified, would meet better the equity and community involvement goals: articulate how parking management can and should consider persons with disabilities; clearly state the role of the community and equity considerations in developing the capital improvement program and project priorities; and modify the community involvement policies to include active participation for a wider range of projects, not focused so much on education and information.

- **Chapter 8 Administration and Implementation** is missing a direct connection to community involvement goals and policies and also connections to the planning work done by bureaus other than BPS. The PEG’s recommendations on reorganization of Chapter 1 policies and Chapter 8 could address some of the gap. In addition, language in the chapter should be reviewed to ensure broad inclusivity and application to any agency conducting work under the Comprehensive Plan. Lastly, the community’s role in implementation and equity considerations are mostly missing from the policies of Chapter 8. With additional work and integration, Chapter 8 could be a useful tool for staff during implementation, not only a section to meet legal compliance with the statewide planning program.

CI PEG Feedback on Working Draft

Chapter Structure / Re-organization

The CI PEG recommends reorganizing goals and policies in Working Draft Chapter 1 to make the document more user-friendly, communicate the policies more clearly, and incorporate the organizational convention shown in Chapters 2-8.

PEG Feedback

- **Move Working Draft policies 1.1 and 1.2 to Chapter 8 Administration and Implementation.** These two policies, requiring an ongoing community involvement program and assigning a body to oversee the program, directly respond to the requirements of the statewide land use program. The CI PEG suggests these policies as functions of implementation, are more closely aligned with the other policies of Chapter 8. Also, relocation of the implementation measures will improve integration of community involvement with other elements of the Comprehensive Plan and, hence, usability of the plan.
- **Reorganize Chapter 1 policies by purpose.** The CI PEG recommends Working Draft policies 1.2-1.14 be reorganized in a way that describes better the intent and applicability of the policies. Through the discussion about reorganization the CI PEG identified some policies, or parts of policies (‘subpolicies’), that would be more appropriately contained in the Community Involvement Program Manual¹ than in the policy document. They have also identified critical concepts not currently captured in the goals and policies language - these are reflected as suggestions for new policies. A summary of these suggested changes to chapter organization and added policy

¹ The City is required to develop and maintain a Community Involvement Program Manual, as part of the statewide land use planning program. The Manual is a how-to document that accompanies but is not adopted and, therefore, constrained in the same way as the Comprehensive Plan document. This allows the Manual to more easily flex to changing populations, techniques, and needs over time.

concepts is outlined below. Specific ideas about revisions to goals and policy language follows the summary.

Chapter 8 - Administration and Implementation

+ [need Goal to include CI program and bridge to Chapter 1]

Policy 1.1 Community Involvement Program

Policy 1.2 Planning and Sustainability Commission [Commission for Community Involvement]

+ [need additional policies to adequately address Development and Update of Community Involvement Manual, Review of Community Involvement Processes, Community Involvement Program Evaluation, and Ensuring Adequate Funding and Human resources - see recommended additions in comments below]

Chapter 1 - Community Involvement

GOAL 1.A. Community involvement as a partnership

GOAL 1.B. Value of community wisdom and participation

GOAL 1.C. Transparency and accountability

GOAL 1.D. Ongoing and diverse participation

GOAL 1.E. Accessible and effective participation

GOAL 1.F. Social justice and Equity

+ [need addition Goal related to address Building Strong Civic Infrastructure]

Ongoing

+ [need to relocate subpolicy 1.4e to serve as the overarching Partners in Decision Making policy with subpolicies 1.4b-d)

Policy 1.4.b-d [subpolicies re Partners in Decision Making - see note above]

Policy 1.6 Early Involvement

Policy 1.11 Accountability

Policy 1.12 Process Evaluation (policy only, subpolicies to the Manual)

Policy 1.14 Capacity Building (policy only, subpolicies to the Manual)

+ [need additional policies to adequately address Community Assessment, Early Involvement, and Developing Staff Capacity]

Project-Specific

Policy 1.3 Representation

Policy 1.4 and 1.4a Partners in Decision Making

Policy 1.5 Transparency (also relates to Ongoing Policies)

Policy 1.8 Adaptability

Policy 1.9 Accessibility (policy only, subpolicies to the Manual)

Policy 1.10 Info for Effective Communication (also related to Ongoing Policies)

Policy 1.13 Best Practices and Innovation

+ [need additional policies to adequately address all project-specific needs, including Data Collection and Analysis, Accountability/ process documentation, Technical information]

Community Involvement Manual

[The Manual has not yet been developed. However, the CI PEG recommends the following elements be included in the Manual, rather than as policies in the Comprehensive Plan document.]

- 1.7 a-d (subpolicies re Process Design)
- 1.8 (only portions specific to methods of Adaptability)
- 1.9.a-e (subpolicies re Accessibility)
- 1.10.a (portions of subpolicy specific to methods of Effective Communication)
- 1.12.e (subpolicy re Process Evaluation)
- 1.13 (only portions specific to methods of Best Practices and Innovation)
- 1.14.a-c (subpolicies re Capacity Building)
- + Advisory Committees, Clear and Relevant Notices, Innovative Methods for Notices

Specific Revisions

Appendix A contains tables with specific revisions, PEG commentary, and additional policy concepts for consideration in the editing of the Working Draft document. It is expected that BPS staff will use these ideas for changes as a guide as the next draft is developed.

Advice on Next Steps for Implementation

In its discussions the CI PEG has surfaced new issues that must be addressed through implementation measures. They have also begun to develop an outline of information to include in a new Community Involvement Manual. It is expected the Public Involvement Advisory Council will work to help BPS staff track on these implementation ideas and progress as possible. The implementation advice is meant to inform BPS staff of the current thinking about how to move forward and aid with revisions to the Manual.

Appendices

- A CI PEG Working Draft Revisions and Commentary
- B Best Practices Resources Bibliography
- C CI PEG Meeting Summaries
- D CI PEG Working Draft Equity and Community Involvement Review (notes)