



TO: Sara Wright, Bureau of Planning and Sustainability

FROM: Carol McCarthy, Chair, Multnomah Neighborhood Association

DATE: March 15, 2016

RE: Discussion Draft of the Community Involvement Program

I am writing on behalf of the Multnomah Neighborhood Association to express concerns identified in our review of the *Discussion Draft of the Community Involvement Program, February 2016* (<http://www.portlandoregon.gov/bps/article/566512>). We have serious concerns about the lack of outreach to the neighborhood associations and coalitions to participate in the preparation of the Discussion Draft, as well as the inadequate time allotted for us to review it and to submit our comments. This document presents some of our other concerns.

The Role of the Neighborhood Associations and Coalitions: The Project Summary states that the report will describe the elements of the CIP that support all legislative land use and transportation projects, yet the document falls short of providing any concrete description of elements specifically related to these types of projects. The role of the neighborhood associations and coalitions are not mentioned in this regard. We consider this to be unacceptable.

Chapter 2 Goals and Policies of the 2035 Comprehensive Plan: These goals and policies have not yet been adopted and hearings on proposed amendments are planned, so we consider it premature to provide comments on their implementation. We have submitted testimony requesting changes to Chapter 2 of the Draft 2035 Comprehensive Plan and we have read similar amendments proposed by Commissioner Amanda Fritz. Some of the requested and proposed amendments are significant and would clarify the important role that the neighborhood associations and coalitions play in land use and transportation planning. We regard this of utmost importance and without reaffirming these roles, we would object to the 2035 Comprehensive Plan and its implementation programs.

Citizen Involvement: As stated in the Discussion Draft, Goal 1 of OAR 660-015-0000(1) requires a citizen involvement program. Yet the Discussion Draft does not mention citizen except when referring to the Oregon statute. One need only read the US Constitution to see that citizenship is the foundation of our democracy and we must respect that fact. Historically, former slaves and their descendants, Native Americans, emigrants, and women have fought to be justly recognized as citizens and to exercise their power as such. To replace "citizen" with the undefined and abstract notion of "community" is fraught with difficulties.

Recognized Organizations: The definition of "Recognized Organizations" on page 13 is a major change and warrants additional public examination. We are committed to all-inclusive public participation through organizations that minimally comply with Oregon's Public Records and Meetings Law, that have open membership, that do not charge dues or fees, that obey their bylaws, and protect against conflicts of interest. We would like to make sure that the requirements for organizations to be recognized be stated and the process for being listed and de-listed be explicit.

Community Involvement Committee (CIC): We would like the CIC to include one representative from each coalition who is selected by their coalition's membership. We recommend that the CIC be under the auspices of the Office of Neighborhood Involvement.

Amendments to Title 33 Planning and Zoning and Title 3 Administration: We are concerned that amendments to Code are being proposed as part of this document rather than through the more normal amendment process.

In conclusion, we do not think that we have had adequate opportunity to participate in the development of the Discussion Draft, nor has the schedule allowed us sufficient time to review a document of this importance.