

Comments submitted to staff on the Discussion Draft of the Community Involvement Program

Full content of emails or letters is included, with the salutations removed. Names were redacted, but otherwise the text was left intact. (Footnotes and attachments to the Eastmoreland Neighborhood Association's comments were not included in this spreadsheet, but are included in the full text of the letter posted online along with all other comments submitted by organizations.) In some cases, comments were summarized from meeting notes, and were reviewed with the commenter, when possible, to ensure that they reflect the commenter's intent. Staff responses are included to indicate whether changes were made between the Discussion Draft and Proposed Draft that were (based on staff understanding of the comment) relevant to the issue addressed in the comment.

Organization	Text of comment (verbatim)	Staff response
	Development on landslides should never be allowed, to protect the safety of both current as well as future homeowners.	No changes made. This is outside the scope of this project
	Need metrics to establish baseline expectations and creat accountability.	No changes made. There are many metrics available for community involvement, but choosing the appropriate ones for a given project is complicated and project-specific. Reviewing the universe of metrics available and creating a "recommended" list of metrics could be an early activity of the new CIC.
	Good to focus on equity and transparency.	No changes made. These will be the initial points of focus for the Community Involvement Program.
	Capacity building is a key issue.	No changes made. This is touched on under "Programmatic Commitments" and also appears in the Manual.
	What will committee's commitment (time, energy) requirements be?	No changes made. These are important questions to answer as BPS works over the next year with ONI, PIAC and OEHR on the logistics to form and charter the CIC.
	Need to explain what the program is, what the context is, and why resources should go to this and not other City activities	Revisions made to draft to clarify context and legislative requirement.
	1) What is the "project"? 2) The section contents, including what section I is, are in the middle of section I. 3) What kind of "program" is this and what is it?	Revisions made to clarify the context and nature of the draft itself and the new Program it creates.
	It's good that PBOT and BPS are together on this.	No changes made. BPS and PBOT have worked together in the development of Chapter 2 and this project.
	When in the process does community engagement kick in? Often when projects are initiated, they come as a surprise to the public. Community engagement needs to start earlier.	No changes made. This is an important concern that is touched on in Chapter 2, and is included in this document, in the Manual. It will certainly be a concern of the CIC and the ongoing improvement of the Manual and ongoing activities.
	Authorship needs to be identified throughout - eg "City of Portland thinks this is important..."	Some revisions to draft to clarify authorship
	Concerned that allowing ONI to determine what organizations are "recognized organizations" may allow organizations to gain that status even if they don't meet state's open meetings law	No changes made. It is ONI's responsibility, as identified in City Code 3.96, to recognize organizations and set standards.
	Neighborhood associations must retain right to free LUBA appeal.	No changes made. This is outside the scope of this project .
	All planning projects should be required to prove that all neighborhood associations have been offered the chance to review each draft.	No changes made. This project describes a proposed program to support and continually improve community involvement, but does not prescribe specific activities.
	All committees should have reserved spaces for representatives from each of the district coalitions	No changes made. This project describes a proposed program to support and continually improve community involvement, but does not prescribe specific activities.
	The word "community" is meaningless. Replace throughout with "citizen". If that is not possible, replace throughout with "public."	Added language (see page 2) explaining choice of word "community" rather than "citizen" or "public."

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	Include requirement that all bodies receiving city money have to follow open meetings law.	No changes made. This project describes a proposed program to support and continually improve community involvement, but does not prescribe specific activities.
	Include requirement that neighborhood associations have veto power in committee member selection	No changes made. This project describes a proposed program to support and continually improve community involvement, but does not prescribe specific activities.
	Include metrics.	No changes made. There are many metrics available for community involvement, but choosing the appropriate ones for a given project is complicated and project-specific. Reviewing the universe of metrics available and creating a "recommended" list of metrics could be an early activity of the new CIC.
	Neighborhood associations should be the framework for all public involvement, need more funding to do outreach. The biggest barrier keeping people from participating in neighborhood associations is that they haven't heard about their neighborhood association.	No changes made. Public involvement through neighborhood associations is valuable to planning processes. Chapter 2, however, clearly points the way to involvement in a variety of ways with a variety of communities, both geographic and non-geographic, beyond the constraints of a single system.
	There is no mention of conflict of interest. Would like a statement in the document defining "conflict of interest."	No changes made. This is outside the scope of this project .
	Legislative requirements section should include itemized list of all legislative requirements	No changes made. There is a list of legislative touchpoints at the end of the Community Engagement Manual, but it is not an exhaustive list of requirements.
	Remove the word "stakeholder" from the document.	No changes made. Staff felt that "stakeholder" is the best way to describe people who have a stake in the outcomes of a process.
	All committees should have requirement that there not be a majority of developers/architects/large property owners - anybody who gets paid to participate.	No changes made. This project describes a proposed program to support and continually improve community involvement, but does not prescribe specific activities.
	Consider including a liaison role between the CIC and ONI	No changes made. Added language about relationships between the CIC and PIAC, which is staffed by ONI and is the appropriate host for such a liaison relationship.
	Include resources for capacity building for organizations	No changes made. This is touched on under "Programatic Commitments".
	Who's the audience?	Some revisions to draft to clarify this.
	Clarify "project" vs. "program"	Some revisions to draft to clarify this.
	Be consistent about whether it's land use and transportation or just land use	Some revisions to draft to clarify this.
	Define "equity"	Added definitions from the Comprehensive Plan glossary to this document.
	Too much jargon	Some jargon is inevitable in a document outlining legislative and code requirements for a technical program, but revisions were made to try to reduce this.
	Please wait as long as possible before publication of the Community Involvement Proposed Draft. City Council has recently published Comprehensive Plan Amendments, which if adopted, will inform the Community Involvement implementing code. City Council is vetting State Land Use requirements, including terminology. PSC has asked also for clearer definitions. E.G. "Citizen", "Public" or "Community".	Adopted amendments affecting this project have been included in the Proposed Draft. Revisions were also made to clarify language and generally make the lanaguage more consistent with other city documents and policies.

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	<p>The Discussion Draft (DD) does not address some questions. Will PSC be eliminated and/or replaced by the CIC? Will the ONI structure be changed? What will be PIAC's relationship with the CIC, PSC, and ONI?</p>	<p>No changes made. The PSC will not be eliminated or replaced by the CIC, but the CIC will take on the state-required role of supervising community involvement activities, as the PSC recommended in Chapter 2. ONI is unaffected by the establishment of this program as a responsibility of the Bureau of Planning and Sustainability. PIAC has participated in the development of Chapter 2 and of the proposed Community Involvement Program. PIAC will continue to have the same relationship with the PSC and ONI that it has now, and will regularly communicate with the CIC when it is established.</p>
	<p>Keep in mind the Neighborhood Associations are the Watchdogs of the City. The ONI office is in City Hall and we are already chartered. We are part of the system of checks and balances. We remind CC and staff that there are rules, and vice versa. According to the DD, the CIC is not a Watchdog (p9). It does not make LU decisions (p14) and its members are appointed by the PBS Commissioner (not the Mayor) and confirmed by CC (p15). Does this give the CIC less credibility than the diverse PSC?</p>	<p>No changes made. The CIC will not have more or less credibility than the PSC. It will be responsible for oversight of community involvement in planning processes. ONI and neighborhood associations will be unaffected by the creation of this committee.</p>
	<p>I have reread the Jan 2015 ONI report "Engaging for Equity". Pages 55-56 recommend an ONI/DLC partnership. Is CIP replacing DCL? Commissioner Fritz in the CC Mar. 18 amendments p11 recommends such partnerships. The Community Engagement Manual should specify legal requirements.</p>	<p>No changes made. The Community Involvement Program does not replace the Diversity in Civic Leadership program. The Community Engagement Manual includes a "Legislative Touchpoints" document but is not an exhaustive list of the existing legal requirements.</p>
	<p>Please also consider the Multnomah Neighborhood initiated SWNI Board letter concerning CIP.</p>	<p>No changes made.</p>
	<p>I thought the CIC covered only certain decisions/actions</p>	<p>Revised text for clarity.</p>
	<p>Economic prosperity: and community members?</p>	<p>No changes made. Text is verbatim from 2035 Comprehensive Plan and cannot be changed.</p>
	<p>Section III: Why the shift to "public involvement" and not "community"?</p>	<p>Revised text for more consistent use of "community involvement" throughout. See text on page 2.</p>
	<p>Section III: Did you look at other places for what they do?</p>	<p>No changes made. Reviews of other jurisdictions' activities were done to some extent during the PEG process.</p>
	<p>Equity and Environmental Justice: I think you mean neighborhood associations? I think that label matters because it's not necessarily the neighborhood connection that proves challenging, it's going exclusively through the NAs (or at least being limited by them).</p>	<p>Revised text in response to this comment.</p>
	<p>Equity and Environmental Justice: I would suggest greater specificity. What is the "however" getting at.</p>	<p>Revised text in response to this comment.</p>
	<p>Equity and Environmental Justice: Can you also ask for more resources</p>	<p>No changes made.</p>
	<p>Community Engagement Manual: Will the practices benefit all stakeholders? I think it really depends on what you mean by "benefit." I worry this could be used against efforts to prioritize equity.</p>	<p>Revised text in response to this comment.</p>
	<p>Community Involvement Committee: "power imbalances" - What does that mean?</p>	<p>Revised text in response to this comment.</p>
	<p>Amendments to Code: I'm a little worried about what will still be mailed. Some people do not have or frequently use the internet.</p>	<p>No changes made. If somebody signs up for notice and provides only a mailing address, they will have to be mailed the notice. They would only receive the notice by another method if it is offered and they accept that option.</p>
	<p>Be accessible to diverse communities: I think you are most interested in how they experienced the process. I do not think you see it as just a number count, and certainly counting people matters; however I worry that people will not focus on the quality of the participation.</p>	<p>Revised text in response to this comment.</p>
	<p>Scope the project with the community: "Scope" is pretty jargony.</p>	<p>No changes made. The word "scope" is familiar to the City staff who will use this manual. The term could be changed by the Community Involvement Committee.</p>

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	Continuously apply an equity lens: I think this needs an additional bullet point about using the equity lens to repeatedly assess who is engaged in the plan making, implementation, and monitoring. I like that the focus is on effects and outcomes, but I also think it's a good place to reinforce the importance of representation.	Revised text in response to this comment.
	Step 1: Identify Stakeholders and do a Power Analysis: There's a lot of great material in this step. I think you could make it clearer that the power analysis is not meant to determine only who is influential and thus important to your project, but also who does not have power but has an interest and needs support. I think you get at this throughout the section, but I would suggest streamlining this section around the concepts of who has a stake and who has power and why that position of power, or lack of it, matters. I think explicating the staff power is a great idea.	No changes made.
	Step 1: Identify Stakeholders and do a Power Analysis: Is decision-making the same thing as the planning process?	Revised text in response to this comment.
	Step 1: Identify Stakeholders and do a Power Analysis: Why not include some things like White privilege, class, gender, education status? I like some of these less conventional ones, but I also think it matters to call out the more dominant ones.	Revised text in response to this comment.
	Step 1: Identify Stakeholders and do a Power Analysis: Is it really about "equitably distributed?" At some level you are looking to allocate resources away from people with vested power to those without power to advance the needs of those without power.	Revised text in response to this comment.
	Step 1: Identify Stakeholders and do a Power Analysis: What do you mean by impacts vs power here?	Revised text in response to this comment.
	Step 1: Identify Stakeholders and do a Power Analysis: What are these guiding questions for? Discussion for understanding stakeholders?	No changes made.
	Step 2: Scope the Level of Community Engagement: I think most of this comes from one of the city's documents. I think one of the challenges of this framing is that it reads like BPS is trying to cover its basis and avoid conflict/getting trouble rather than seeking input. I think these are important things to think through, but the framing reads as contradictory to what you have been doing throughout the document. I wouldn't get rid of the questions, just reword them and think of them from a more empowering perspective.	Revised text in response to this comment.
	Step 3: Plan the Community Engagement Process: I would suggest calling this a strategy. Because the engagement informs a plan, it might get confusing to have multiple plans. Plus land-use plans tend to have a specific meaning.	Revised text in response to this comment.
	Step 3: Plan the Community Engagement Process: I think for this section, you want to identify the purpose of the engagement. Why are you seeking input? What are the City's expectations of the engagement? What are the community's? What are the different processes and related methods and tools that are necessary to accomplish the goals of the engagement strategy?	No changes made.
	Step 3: Plan the Community Engagement Process: Are there more details for evaluation and accountability - what does this look like or mean?	Revised text in response to this comment.
	Legislative Touchpoints: I'm not sure how to get at this here and maybe it's not appropriate, but one thing I have noticed is that many processes do not provide language assistance at the City and people say it's not needed. I liked the inclusion of language about exceeding the federal requirements. I think people are really skirting or trying to do the bare minimum. I also think that governments don't want to pay for it. Can you strengthen the language here to make it mandatory?	No changes made. This is an issue that can be visited by the Community Involvement Committee, but should also be referred to the Office of Equity and Human Rights.
	Difficult to read with many of the letters (especially "t"s and "l"s missing. Perhaps a spell check is in order	No changes made.
	I mentioned this first comment before I think – be more directive about who the document is for and how it should be used.	Some revisions to draft to clarify this.

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	Goal #2 on page 1 should be Goal #1 of the statewide land use planning program.	Revised text to correct this error.
	Still on page 1, I would also suggest moving the powerful phrase: "Experience proves..." to the very first phrase as it is the "why".	Revised text in response to this comment.
	I really appreciate the Equity and Environmental Justice sections with the historic perspective. Is there a way to do staff training on this to implement the strategies on page 10?	No changes made. This is outside the scope of this project, but could be addressed within the program once it is established.
	Equitable engagement is one thing – associated investments and agreements (e.g., Community Benefit Agreements) that work to correct or mitigate some of our past actions is another. Is there a way to get at that as well? Otherwise, it's engagement w/o result.....	No changes made. This comment identifies an important equity issue that is beyond the scope of this project.
	Regarding the Community Involvement Committee, is there a way to bind this to the Planning and Sustainability Commission (e.g., a liaison) in addition to the support mentioned on page 17? Again, without a tie to investments as well (perhaps a liaison to the budget committee?), we could have words without action.	Revisions to draft to include liaison relationship with PSC and budget committee.
	I like the guidelines on page 20 – the know the community. You might emphasize listening. And, understanding the history of the place (neighborhood) and historic injustice as essential context.	Revised text in response to this comment.
	The guideline of Continuously Apply and Equity Lens seems to get at associated changes or investments that would result from such proactive and careful community involvement. Can we be more explicit? Can you add a bullet that calls upon staff to help take care to follow-through and ensure these recommendations come to fruition? Or, the communities involved understand the "why not"?	Revised text in response to this comment.
	I like the power analysis and strongly recommend we as planners look at the power analysis ourselves. In other words, to use it to look in the mirror. What is our role and opportunity serving the community?	No changes made.
	Again, I would focus on "listening" in each step. Can't be overstated, such as the subbullets on page 22 "what does this look like in practice"? Start with listen, learn, interview. Take notes, reflect, share. Check. Repeat.	Revised text in response to this comment.
	You have some great guidance on that on page 24 – expectations.	No changes made.
	You may also want to define community engagement vis a vis community involvement or pick your terms carefully. Step 2 on page 24 refers to community engagement (my preference – implies a longer term relationship) but the title is Community Involvement Program which is probably more appropriate given project based work...	Revised text for more consistent use of "community involvement" throughout. See text on page 2
	I would add "why do stakeholders care" to the list on page 25 (guiding questions) – to the "how much". In general, in that section, I would use "how" e.g., to involve media – instead of "what level"... "how can you overcome difficulty"... These are tough questions that will require a lot of listening and mapping. Definitely into dispute resolution territory of focusing on shared interests and looking for multiple benefits from every decision – maximizing gain to communities who have experienced generational discrimination.	Revised text in response to this comment.
	Love Step 4 for adjustment.	No changes made.
	Consider adding a focus on community members doing the reporting/ celebrating in Step 5. Consider them project partners – can you bring them on as paid project partners in some cases and compensate them for their time? You can always do mini-RFPs to broaden the field. [I know I make it sound so easy. Sorry.]	No changes made. Developing and improving tools for building partnerships with organizations and individuals will certainly be part of the Community Involvement Program's ongoing work.
	Finally, on the City requirements, will this replace the Public Involvement Principles and PIAC? If not (if those are citywide), what will be the relationship and how can we do shared learning and improvement?	Added clarifying text (see page 11).

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	P. 1: Move <i>“what’s in this report”</i> section above the heading for <i>“Section 1”</i> as it seemed awkward to reference a section you’re already in.	Revised text to remove this section and other parts at the beginning to reduce redundance and confusion.
	P.2: Early implementation project of the Comprehensive Plan: <i>might be helpful to list other implementation projects, for context</i>	Revised text in response to this comment.
	P.3: <i>Commissioner Fritz has a proposed amendment to 2A that’s on the current “amendments list.”</i>	Adopted amendments affecting this project have been included in the Proposed Draft.
	P.5: Comprehensive Plan Policy: <i>Edit very last paragraph in this section to say “...members who engaged in public involvement processes between (date range if you’re able – even a range of years?)”</i>	Revised text in response to this comment.
	P.6: <i>Make sure that there is consistency in italicizing “Chapter 2” or “Chapter 2-Community Involvement” as a title – either italicize or don’t but be consistent throughout document.</i>	Revised text in response to this comment.
	P.7: Equity and Environmental Justice <i>Remove hyphen from “Land-use” in paragraph 3; reword last sentence in paragraph 6 on equity as it read oddly. Suggestion: “A focus on equity in any public involvement process is an essential component of improving outcomes for under-represented and under-served communities.”</i>	Revised text in response to this comment.
	P.10: Last paragraph, last sentence: <i>change “Carrying this through” to something more specific – “Achieving the desired outcomes...?”</i>	Revised text in response to this comment.
	P.21: Be accessible to diverse communities: <i>Add to bullet on “people friendly and culturally responsive strategies” to say “translated materials and on-site interpretation” or something to emphasize written and real-time translation services</i>	Revised text in response to this comment.
	P. 25: <i>Under “Expectations” add “food and child care” to the third bullet</i>	Revised text in response to this comment.
	P.26: Last paragraph: change “have” in the first line to “foster” or “support”	Revised text in response to this comment.
	Here is my overall comment on the proposal. There are elements that I could comment on but until this core problem is resolved I prefer to have the entire proposal fail. The name of this effort does not explain the program nor its intent. A more communicative name would be Land Use Regulation Advisory Committee. By using the name Community Involvement it is misleading.	No changes made. The Committee, as required in Policy 2.19, is charged with overseeing community involvement in the processes of planning projects, not the regulations that are the products of planning projects.

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	<p>The quote from Statewide Goal 2, Community Involvement, of the Comprehensive Plan Goals and Policies, you suggest this program as written meets the definition which requires municipalities to “develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process.”</p> <p>The committee set up in this draft proposal does not do that. Instead it is wholly controlled by the Director of the Bureau of Planning and Sustainability. The Director appoints the committee, sets its agenda, selects its leadership, receives its reports, evaluates those reports, and then selects what advice will be considered and what advice will be dismissed. There is no clear requirement for disclosure of the committee suggestions beyond being provided to the Director.</p> <p>If this is a “personal” advisory committee aimed at telling the Director what land use regulatory issues are involved in implementation of the Comprehensive Plan there is no requirement for that information to go beyond the Director.</p> <p>The result of that locked in system will be unlikely to have any real impact on the Director since the Director has already developed the regulatory expectation of Comprehensive Plan Land Use implementation. Without some non-bureau input and evaluation by other Land Use Regulation involved bureaus it essentially gives both creation and evaluation of Comprehensive Plan Land Use policy implementation to a single bureau and its Director.</p>	<p>The proposed role and authority of the Community Involvement Committee has been revised in the Proposed Draft. However, the Discussion Draft does not describe a role for the Bureau Director in the Committee's activities as described in this comment.</p>
	<p>Community Involvement, even in the planning of how to implement the Comprehensive Plan Land Use goals and policies, cannot be met by an advisory committee under the total control of the Director and with no requirement for public information about what they are discussing, their advice, and how it is impacting Bureau of Planning and Sustainability decision.</p> <p>I think to call this a Community Involvement Program, even if its goal is to advise the bureau on what is needed to implement Comprehensive Plan Goal 2, is simply confusing and misleading and cannot meet the intent of even the most well- intentioned program in the bureau</p> <p>Note: While the language in this proposal notes the Community Involvement Committee to be established will be managed by the Commissioner in Charge of the Bureau of Planning and Sustainability I have used the focus as being the Director of the bureau. Since the Commissioner in Charge of the Bureau selects the Director, who reports directly to the Commissioner, the reality is without a more open process of information sharing the Director will determine how much true Citizen Involvement is present in the work of this program.</p> <p>Developing a Citizen Involvement Program without including citizen involvement in its actions simply does not meet the intent of the Comprehensive Plan process and does not offer actual implementation of the plan.</p>	<p>No changes made. It is not possible to establish a prescriptive step-by-step guide for community involvement activities in planning projects. The 2035 Comprehensive Plan lays out the goals and policies toward planning projects must work, and the Community Involvement Program is intended to provide the structures for continual improvement of those activities.</p>
	<p>There is only one mention of Neighborhood Associations and that mention only says Neighborhood Associations exist. If Neighborhood associations have any role in the new comp plan it is to increase participation, but it is unclear what the participation will be in. At the same time, the city will create five new groups of underrepresented people and provide city funding and training for these groups, as well as increased participation by non-profit groups, community based organizations and faith communities, which may be mainly non residents of Portland. If there is any role for Neighborhood Associations it is not stated in a manner I can find. Until I am corrected, what I can see in the New comp plan is a reduced role, indeed a role that is not have the authority of other groups.</p>	<p>This document does not assign specific roles to specific organizations, or designate specific organizations to receive City funding or training. The Office of Neighborhood Involvement is charged with formal recognition of neighborhood associations.</p>

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	<p>This whole chapter and process disempowers public participation in the process and discourages individual citizen engagement in the process. The model is to cherry pick individuals and suggest that they are representatives of whole groups. And their role in the process is largely passive and there is no true sense of engagement. Engagement requires participation of all parties, and there is little incentive or stick provided to make BPS and the City accountable.</p>	<p>The intent of the proposed Community Involvement Program is to expand and deepen community involvement. The Program is designed to be continuously improving community involvement practices. If there is anything in this document that can be understood to disempower public participation or discourage engagement, we hope that people will identify the specific text for the PSC to address in the development of the Recommended Draft. Once the Program is established, it will provide a structure to address specific concerns and recommendations about how to improve ongoing and project-specific</p>
	<p>It doesn't provide for short term engagement or specific expertise concerns -- or how to develop skill sets for career enhancement. Millenials and many other groups want time-limited projects that have tangible results.</p>	<p>In terms of length of engagement, specific requirements are outside the scope of this document. Career skill sets are related to capacity-building, which is touched on both in Chapter 2 and in the Manual, but this document cannot prescribe specific requirements for planning project to include career skill set development in community involvement activities.</p>
	<p>Relying on web based surveys can be useful -- but the City has a bad track record (examples - Harbor Superfund survey, BPS-RIP survey).</p>	<p>No changes made. This project describes a proposed program to support and continually improve community involvement, but does not prescribe specific activities.</p>
	<p>Plus sometimes engagement, particularly in non-dominant cultures, requires building trust and personal involvement/time/shared experiences, storytelling etc.</p>	<p>No changes made. The acknowledged need for relationship-building is identified in the Manual.</p>
	<p>Words matter and there is a huge difference between involvement (aka tokenism), engagement, partnership and participation. Citizen and community and stakeholder (a term missing in most of the manual) lead to different tools and models.</p>	<p>No changes made. The word "community" is used to reflect the fact that there are many communities, and individuals may consider themselves members of many communities. It is not intended to indicate that there is no role for individuals. The word "citizen" is not used because it can suggest that legal citizenship is a prerequisite for civic involvement, which is not the case. The choice to replace "citizen" with "community" is intended to open the doors and welcome engagement with everyone. The choice to use "community" rather than "public" is intended to reflect a less formal approach to involvement, and make the process feel less rigid.</p>
	<p>Granted, the City of Portland Public Involvement Principles reads well on paper; it continues to be ignored on all levels of City Government starting from the Mayor, City Commissioners down to their Bureaus. Another example of where an Ordinance lacks stiff enforcement penalties with charged to the guilty individuals. Take for example, when found guilty last December, 2014 -- Portland's City Auditor choose not to issue that Federal Fine \$500 to Mayor Hales and Commissioner Novick for meeting behind closed "kitchen doors" in the home of a well known Lobbyist. Had this Multnomah County property owner had the POWER, I would have simply garnished their next paycheck(s)!</p>	<p>No changes made. The activities of the federal government, the City Auditor and City Council are outside the scope of this project.</p>
	<p>City of Portland Public Involvement Principles Adopted by the City of Portland, Oregon on August 4, 2010. Portland City government works best when community members and government work as partners. Effective public involvement is essential to achieve and sustain this partnership and the civic health of our city. This:</p> <ul style="list-style-type: none"> □ Ensures better City decisions that more effectively respond to the needs and priorities of the community. □ Engages community members and community resources as part of the solution. □ Engages the broader diversity of the community—especially people who have not been engaged in the past. □ Increases public understanding of and support for public policies and programs. □ Increases the legitimacy and accountability of government actions. <p>The following principles represent a road map to guide government officials and staff in establishing consistent, effective and high quality public involvement across Portland's City government. These principles are intended to set out what the public can expect from city government, while retaining flexibility in the way individual city bureaus carry out their work.</p>	<p>No changes made. The Community Involvement Program carries out the Goals and Policies in Chapter Two of the Comprehensive Plan, which was written based on the Public Involvement Principles.</p>

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	<p>And (name redacted), if your prediction holds true, then consider the (name redacted)'s gentrified out of Multnomah County -- maybe Oregon. And thank you for sharing the MNA Discussion Draft of the Community Involvement Program Goal 1 of OAR 660-015-000(1), "requires" a citizen involvement program. Something for all of us to seriously consider when "hiring" individuals to serve "WE THE PEOPLE" with our VOTES come November, 2016.</p>	<p>No changes made.</p>
	<p>I like the graphics of how the plan moves forward at the bottom. A little visual goes a long way.</p>	<p>No changes made.</p>
	<p>Need to look into the Oregon Statewide rule about changing the word 'Citizen' to 'Community', you do a great job of using the word community. (Page 1) Someone reading this with less English proficiency might read this and think because they are not citizens their voice won't count. I recognize this is at the State level not your agency.</p>	<p>No changes made.</p>
	<p>Very good Equity principle goals, concise.</p>	<p>No changes made.</p>
	<p>Small descriptions after the section heads are very helpful.</p>	<p>No changes made.</p>
	<p>Great Q&A about the CIC. Page 9.</p>	<p>No changes made.</p>
	<p>Page 12 DLCD?</p>	<p>Revisions made to reflect this suggestion.</p>
	<p>Page 15- Good outline on CIC.</p>	<p>No changes made.</p>
	<p>Page 23- Power Analysis? Is this something you put together or a product of someone else? I train DCL's and others on power analysis through a program developed by a group named Agenda in L.A. - would be happy to present it to you.</p>	<p>No changes made.</p>
	<p>Page 24- My observations through working with the DCL leaders is that at the beginning of their programs the biggest problem is that new leaders don't know what they don't know. They aren't aware of the realm of possibility. Case in point, many tribal groups from all over the world prefer to live near or with people like themselves, it enhances their support system, helps to preserve culture and provides the ability to keep more eyes in the youth. The hope is that intergenerational housing, like 5 and 6 bedroom units could benefit these families more. We in this country tend to believe in a more individualistic society requiring many individual units to keep us separate while the benefits of larger dwellings can provide more support in many ways by preventing displacement when rents or mortgages become so high that the one breadwinner can no longer afford to keep the home and ends up being homeless. Newer participants tend to only choose from the already created list and not offer ideas that community and cultural wisdom has provided for centuries. This is just one example of what these groups can contribute if nurtured properly.</p>	<p>No changes made. This is an important point that should be addressed in the Community Involvement Program.</p>
	<p>Walking into what appears to be an already established group of stakeholders tend to put a new person into the position of first learning the groups etiquette. Many times new participants stay quiet until they either learn the way of the group or observe that there clearly are those who dominate the conversation and they feel their participation is minimal. They may continue to attend to fulfill some obligation to their organization or community or to respect the relationship they are building with the agency person because staff is showing appreciation at their participation. (Which is what staff should be doing) So creating opportunities to check in with new participants should be happening to help people historically un-engaged or under-engaged gain the level of understanding that empowers them to participate fully.</p>	<p>No changes made. This is an important point that should be addressed in the Community Involvement Program.</p>
	<p>Page 25- I do like the guiding questions. They look very well thought through.</p>	<p>No changes made.</p>

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	<p>Page 26- The description of how to do good tracking of the process and report back is excellent. This issue of not completing the circle is one of the largest concerns to community.</p>	<p>No changes made.</p>
	<p>There's something confusing about this intro —1)on the one hand it seems to be saying the CIP will guide us in new directions, but then it goes on to say 2) this is only about LEGISLATIVE (should the preceding word be in bold, italic or some such thing to call people's attention to the fact that we are only talking about the legislative domain) land use and transportation projects? And then Why is this important? (nicely said BTW) seems to go back to the big picture view of the CIP's purpose: "This project implements policies in Chapter 2, Community Involvement, of the Comprehensive Plan Goals and Policies. It also meets Oregon Statewide Land Use Goal #2, which requires municipalities to "develop a citizen involvement program that insures the opportunity for citizens to be involved in all phases of the planning process." Or could you just add an "also" before "describes" to make it seem that the legislative function is just one of several key functions of the CIP?</p>	<p>Revised text to clarify context.</p>
	<p>Could we omit the list of elements of the CIP until the section where you go into them in more detail at the bottom of P.7?</p>	<p>Revised text to remove this section and other parts at the beginning to reduce redundance and confusion.</p>
	<p>Guiding principles of the Comprehensive Plan (last line, 1st Par) ...and direct legislative projects [related to] in keeping with? or in accordance with? all the Guiding Principles. Are you saying here that legislative projects will involve people according to the Guiding Principles?</p>	<p>Deleted text of Guiding Principles to avoid confusion, make document less cluttered.</p>
	<p>Environmental health: Weave nature into the city and foster a healthy environment that sustains people, neighborhoods, and fish and wildlife. Recognize the intrinsic value of nature and sustain the ecosystem services of Portland's air, water and land. (I'd suggest reversing the order of these two sentences. Lead with "recognize"...? While listing everything from people to wildlife, you (they?) never mention plants? What about the tree canopy and all the backyard habitat certification which assumes plants?</p>	<p>Deleted text of Guiding Principles to avoid confusion, make document less cluttered.</p>
	<p>Section III Can you put a link or some instructions at the end re: where PI comments from the public can be accessed?</p>	<p>No changes made. All testimony is available in PSC e-files, but linking specifically to those related to public involvement in the Comp Plan is not yet possible.</p>
	<p>Section IV CIP Shouldn't there be an item that asks the City to carefully assess the likely benefits and burdens expected to result from any proposed project before the item on engaging those likely to be adversely affected?</p>	<p>No changes made. The assessment of benefits and burdens is included in the Community Engagement Manual.</p>
	<p>Can we find another word for responsive so we don't have responsive and culturally responsive following each other in the same sentence?</p>	<p>No changes made. This text is verbatim from the 2035 Comprehensive Plan and cannot be changed in this document.</p>
	<p>Why not combine the text for each of these two special topics in one place instead of listing them and then expanding on them at greater length below? In either case, here are some small suggestions for strengthening the language.</p>	<p>Revisions made to reflect this suggestion.</p>
	<p>Transparency of Process p, 6 ...requires that public processes and decision making {is} ARE more transparent about how public input...</p>	<p>Revised text to correct error.</p>
	<p>P. 6 Transparency here means making sure the public {knows it was heard} receives acknowledgement its comments were received by appropriate staff and decision makers along with {and making} clearer connections between the communities' expressed needs and the outcomes of the project. (I'm hoping someone else may have suggested clearer language for this section.)</p>	<p>Revised text to clarify overall.</p>

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	Equity and Environmental Justice P. 7 Par 4 — Portland also has a long history of strong public involvement {with neighborhoods} through its system of recognition and support for its neighborhoods. (I'm trying to strengthen this sentence and make it more accurate.)	Revised text in response to this and other comments.
	Transparency in Process P.7 This means giving the public the ability to see how input will be used, how it can affect the project, who will make the decisions {along the way} at each phase of the project, and how the process will be recorded and made available to the public.	Revised text in response to this comment.
	A. Legislative Requirements P. 8 Should there be mention of recommendations from the community that residents as well as property owners be notified in the future?	No change made to this text. Text was added in a different part of the document (page 14) to reflect that BPS and BDS are working together to explore this issue.
	C. CIC The CIC will advise staff on the design, implementation and evaluation of public engagement practices for significant projects — Add “evaluation” to make it consistent with the Statewide goal? The CIC may also periodically report to the Planning and Sustainability Commission on their observations about community involvement practice and its effectiveness in meeting the goals of Chapter 2 of the Comprehensive Plan.	Revised text in response to this comment.
	P. 10 “Process improvements and staff time to better and more efficiently track public inquiries, contacts and follow-up. This is needed for transparency and ongoing process improvement. “ Shouldn’t this also mention public testimony in the list of things being tracked?	No changes made. Testimony is included in the public contacts category, and is addressed again in the transparency in decision-making point.
	P.21 Resource staff and community capacity This heading isn’t clear to me. I think I know what it means based on the text underneath it, but it could more readily signal what is to follow instead of requiring the reader to piece it together.	Revised text in response to this comment.
	P. 22 Scope the project with the community Will you want to work with the community at the beginning to decide what the criteria will be for success (process and content?) and how they will be tracked/measured?	Revised text in response to this comment.
	P. 22 Continuously apply an equity lens Staff are responsible for seeking out the voices and interests of under-served and under-represented communities who may be negatively impacted by a decision and mitigat(ing) or providing mitigation for these impacts	Revised text to correct error.
	Manual has a lot of excellent info, but seems redundant in places. Not sure how to address this since it is important to lay out the PI principles, the Equity Framework and the Steps for PI, but there is some overlap.	Some revisions to improve clarity.
	General Comments 1. BPS staff deserve recognition for the difficult work of drafting an entirely new Community Involvement Program (CIP) for the City that seeks not only to implement the numerous goals and policies of Chapter 2 of the Comprehensive Plan, but also to integrate several years of public input on the chapter.	No changes made.
	General Comments 2. Throughout the draft there are opportunities to clarify how the program relates to ongoing public involvement activities vs. project specific activities. This distinction is central to Chapter 2 policies and would be useful to highlight in the program document. In particular, it may help to clarify the role of the Community Involvement Committee (CIC).	Revised text in response to this comment.
	General Comments 3. The scope of plans, policies, projects and investments to which the CIP applies (and over which the CIC has advisory capacity) could be clearer to this reader. Similarly, the role of the CIC seems to be somewhat unresolved (e.g., general review of the CIP with some work on “significant” projects vs. advice/support across all projects as needed).	Revised text in response to this comment.

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	<p>Page 1, Section 2 The draft says that the CIP applies to “projects that make a change to the Comprehensive Plan that require legislative decisions and action.” Isn’t it the case that the CIP applies to all projects that are covered by the Comprehensive Plan, not just those that change the Plan? Does this mean that projects consistent with the Comp Plan (vs. changing the Comp Plan) are not subject to the public involvement requirements of Chapter 2? Isn’t it more accurate to say (as is said throughout the document) that all decisions that implement the Comp Plan are within the purview of the CIP? Elsewhere (p5) the document references “projects that affect the Comprehensive Plan” (vs. change it).</p>	<p>Revised text in response to this comment.</p>
	<p>Page 6 SUGGESTION: On the fifth bullet point, change “responsive” to “accessible.”</p>	<p>No changes made. This text is verbatim from the 2035 Comprehensive Plan and cannot be changed in this document.</p>
	<p>Page 6 SUGGESTION: Under “Transparency of Process” add the concept that transparency is related to accountability (how public input affected decisions/outcomes).</p>	<p>Revised text in response to comment.</p>
	<p>Page 7 SUGGESTION: In the fourth paragraph, change “However” to “At the same time.” Strike “of the” before “communities” in the last sentence (since there aren’t definite boundaries for all communities, and people can have multiple community identities).</p>	<p>Revised text in response to comment.</p>
	<p>Page 7 SUGGESTION: In the sixth paragraph, define/describe “institutional racism.” Strike the last sentence. This section needs to be carefully worded to emphasize that engagement of neighborhoods and non-geographically based communities can be strengthened together (not either/or). It should honor the ongoing importance of the neighborhood system and the need to expand the City’s approach beyond geographically defined communities. It is not zero sum, but some readers might get that impression.</p>	<p>No changes made.</p>
	<p>Page 7 SUGGESTION: Change title of second section to “Transparency of Process” for consistency with previous page. In the first sentence on transparency, I question whether the core purpose of transparency is to improve equity. It can, but the most important function of transparency is to let people know that their participation is meaningful and to hold decision makers accountable.</p>	<p>Revised text in response to comment.</p>
	<p>Page 7 SUGGESTION: Expand the last sentence in the first paragraph on transparency (“...record, organize, and preserve that feedback...”) to detail exactly when and where transparency is needed at each stage of the public process. So, transparency regarding the scope of potential public influence over a plan or project, transparency about the public process itself and opportunities to participate, transparency about the characterization of public input (what staff heard), transparency about how staff conveyed public input to decision makers, transparency about how public input affected decisions and outcomes.</p>	<p>No changes made. This issue is important, but the level of detail and specificity is deeper than is appropriate in this document.</p>
	<p>Regarding Elements of the CIP, aren’t the goals and policies of Chapter 2 also parts of the CIP to the extent that its central purpose is to implement them?</p>	<p>No changes made. Chapter 2 is the guiding force for the Community Involvement Program but is not a part of the program.</p>
	<p>Page 8 Add “and State law” to the first sentence on legislative requirements?</p>	<p>Revised text in response to comment.</p>
	<p>Page 8 Any other examples of how City code relates to public involvement besides notification?</p>	<p>No changes made.</p>
	<p>Page 8 SUGGESTION: In the first sentence under Community Engagement Manual, change “to guide” to “as a practical guide to help” City staff. In the second paragraph in the same section, say “The practices are intended to benefit all stakeholders...”</p>	<p>Revised text in response to comment.</p>
	<p>Is it only the Director of BPS who has authority to amend the Manual? If so, maybe emphasize here (as stated later) that the role of the CIC is to make recommendations to amend it periodically, since review of the manual is an explicit function of the CIC.</p>	<p>Changed role of CIC to include responsibility to directly amend the Manual.</p>
	<p>In the section on the CIC: Maybe say who creates the CIC (City Council).</p>	<p>Revised text in response to comment.</p>

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	<p>In the section on the CIC: Be more specific about the roles of the CIC. This would be a good place to talk about ongoing activities required by Chapter 2 in addition to project specific activities. CIC reviews the entire CIP, including ongoing activities apart from any particular project, to make sure it is achieving the goals and implementing all policies of Chapter 2. In addition, it advises staff on significant projects. And, later in the document there is the suggestion that it can have a similar role on <u>any</u> project at the request of the CIC or staff. And it has a similar role for plans, policies and investments (not just projects).</p>	<p>Revised text in response to comment.</p>
	<p>In the section on the CIC: Define “significant projects.”</p>	<p>Revised text in response to comment.</p>
	<p>In the section on the CIC: Is it really possible for CIC to advise staff on project “outcomes?” If so, what does that mean?</p>	<p>Revised text in response to comment.</p>
	<p>In the section on the CIC: In the paragraph after the bullet points, add “review and support the community engagement work...” Even if it’s not a policing body, the CIC’s review is a critical function in addition to supporting staff.</p>	<p>Revised text in response to comment.</p>
	<p>In the section on the CIC: Power imbalances between and among whom? Different groups or communities? The government and the people? Needs more explanation and context if this language is used here.</p>	<p>Revised text in response to comment.</p>
	<p>In the section on the CIC: SUGGESTION: In the last paragraph, change the third sentence to “...CIC may recommend changes to the Manual, the Community Involvement Program, and community involvement practice on specific projects.”</p>	<p>Changed role of CIC to include responsibility to directly amend the Manual.</p>
	<p>Page 9 - Instead of “or if staff so choose,” say that a project may come before the CIC “if the CIC or staff requests it.” SUGGESTION: Explain why people should go to staff before the CIC if they have concerns. It’s not to shield staff from criticism, but because of the limited capacity of the CIC. At the same time, the CIC does have the power to review PI plans and practices, so it’s not entirely inappropriate for people to approach the body with concerns. It might be discouraged as a practical matter, but I’d be cautious with the language here to avoid the impression that the CIC is being set up only to support staff in relation to public concerns. Its purpose is to improve practices, which involves supporting staff, but its review function also gives it the role of potentially being critical at times.</p>	<p>Revised text in response to comment.</p>
	<p>Page 9 When and how will the CIC be established? Some concerns about this section: -Not sure that “ONI’s best practices” is something specifically established. Not entirely clear what this means as a matter of process for selection. -Not sure about PIAC’s role. Advice on specific candidates? Maybe something to bring to PIAC. -Suggest that the representation should be broadened beyond racial, cultural, socioeconomic. If enumerated like this, I’d at least add geographic. Ability/disability? “Full diversity” of the city?</p>	<p>No changes made. These are important questions to answer as BPS works over the next year with ONI and OEHR (and PIAC) to develop the committee logistics.</p>
	<p>Page 9 How is it different than PIAC?</p>	<p>Revised text in response to comment.</p>
	<p>Page 9 Suggest changing “activities” in the first sentence to “guidelines, policies and practices.” Suggest changing second sentence to “...does not generally allow for substantive attention to specific projects.”</p>	<p>Revised text in response to comment.</p>
	<p>Page 9 Are there no agencies other than BPS and PBOT that are subject to the Comp Plan (and Ch 2)?</p>	<p>No changes made. Any agency making changes that affect the Comprehensive Plan will be subject to Chapter 2.</p>
	<p>Page 10 Fourth bullet point: Suggest changing to “implement processes that successfully engage the full range of communities, individuals and groups affected by land use and transportation planning.”</p>	<p>Revised text in response to comment.</p>

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	Page 10 Fifth bullet point: Suggest adding “contracts or stipends” to last sentence and changing to “well-positioned to partner with the City to engage targeted communities.”	Revised text in response to comment.
	Page 12 Need some context or section title to help relate the commentary to the code change.	Revised text in response to comment.
	Page 12 Last sentence in the definition commentary (referencing the ONI process) is confusing.	Revised text in response to comment.
	Page 13 Minor point, but there is an extra “and” in the lists in numbers 1 and 3 because of the additions.	Revised text to correct error.
	Page 15 Suggest changing section A to: A. Purpose. The Community Involvement Committee (CIC), an independent advisory body, is charged with reviewing, commenting, and advising bureau staff on the community involvement elements of legislative projects. The Committee will accomplish these goals by: 1. Providing advice and support to staff on community involvement for plans, projects, policies and investments within the scope of the Comprehensive Plan 2. Upholding the Comprehensive Plan Community Involvement goals and policies 3. Recommending changes to ongoing and project-specific community involvement practices	Revised text in response to comment.
	Page 19 Mention Chapter 2 in the third paragraph about the manual (the chapter calls for the manual).	Revised text in response to comment.
	Page 20 On the equity framework, suggest changing the first sentence after the first set of bullet points to: “...should be both ongoing and project-based.”	No changes made. There are references throughout this section to activities that are ongoing.
	Under “Know the community,” suggest deleting the first two sentences and moving straight to “Working to understand...”	Revised text in response to comment.
	The concept of “performance measures” could use more context. Are these binding? Is there a process for assessing them? Where did they come from?	No changes made.
	Page 21 In the section on being accessible to diverse communities, suggest changing “accessible” to “responsive” for consistency with earlier text (accessible meaning more broadly welcoming, responsive pertaining specifically to cultural diversity). In the section here on what this looks like in practice, change “and/or food” to “food, etc.” to acknowledge that there are many more culturally responsive strategies.	Revised text in response to comment.
	Page 23 Add a brief statement that these steps related to project-specific engagement, and that there is also ongoing involvement – activities apart from any particular project – that are critical and required by Chapter 2, as noted earlier.	Revised text in response to comment.
	Thank you for the opportunity to review the discussion draft of BPS’s community involvement program. Overall, I think this is a good draft for moving the discussion about institutionalizing community engagement in land-use planning, something that lives up to the Portland reputation for working with and empowering communities. In particular, I think the engagement manual (Appendix A), starts laying out how planners can effectively work with communities in a concise and useful manner. I have some general comments I provide below and included ‘sticky notes’ in the attached pdf. Some of my comments are tensions within the practice of engagement and common across many places in which I have worked. They may not be resolved in your work, but it may help you work towards resolving them long term by calling them out. I am also not sure how much you want fleshed out in the document before it is finalized. I think more is better; however, that might not be what BPS envisions.	No changes made.

	<p>Purpose: I think it would be helpful to add language about the fundamental purpose(s) of engagement for BPS? I think there are implications of the goal(s) throughout the document, and there are the lists of commitments from the comprehensive plan draft. Two purposes seem to be environmental justice and equity and transparency. However, I am not sure how you are thinking about accomplishing this or what the other overarching goals are. Are you seeking public deliberation or input or empowerment or community building or...Can you add a paragraph early on where you articulate the goals, or for lack of a better word, the BPS's "vision" for engagement? What does engagement look like, and what will it accomplish? Similarly, in Appendix A, I think you want to ask planners to identify the purpose of the engagement. Why are they seeking input? What are the City's expectations of the engagement? What are the community's? What are the different processes and related methods and tools that are necessary to accomplish the goals of the engagement strategy? Thinking about the interplay between individual projects and BPS's long term engagement goals, I assume there are specific goals per project, but there are likely general city goals regarding engagement that may or may not take front stage in every given project. Can these efforts be chronicled as well? For instance, while the City might want have an overall goal of building capacity or community across its participatory activities, a given project may only be able to accomplish that to some degree. Articulating when and how some of these goals can be accomplished is an important part of transparency. By tracking the larger goals – whether they are primary, secondary, or tertiary in a given project – you can also identify if some of the larger goals are never being addressed and whether one or two are always being addressed. I think this will help ensure the more abstract goals, and goals meant to cut across all planning activities are being addressed.</p>	<p>No changes made. This is, however, an important question for BPS and the Community Involvement Committee to begin working with.</p>
	<p>Racial Equity: My understanding is that the equity framework is about racial equity. If this is the case, I think it needs to be clearly stated. If not, I think you need to define who you are prioritizing within an equity framework. Otherwise, you will have everyone coming up with some sort of metric to make themselves appear to come from an inequitable background of some sort. Either way, I would add some discussion about race in the document specifically. There are several places where I think the document reads as if you are talking around race without naming it. I also encourage you to discuss what an equity orientation might mean for how other people's participation. In the main document, I am not clear about how you are going to address (racial) equity; however, this becomes clearer in the appendix. I suggest better integrating what is in the appendix into the main document, otherwise it reads like you have not developed ideas about how this will work. You highlight well that better engaging communities of color matters as well as the role of the planner in identifying disparate burdens regardless of whether communities of color are participating. I think this is could be made even stronger. I think planners and community members too easily lose track of the fact that even if marginalized populations are not at the table, it does not mean their needs cannot be identified and incorporated into planning.</p>	<p>Revised text in response to comment.</p>

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	<p>Community Involvement Committee: The CIC proved the most disappointing section for me, but also has the most opportunity. Without some type of vested power, I am not sure what the CIC can and will actually do. I know that members of the state CIC as well as related staff and community members have been frustrated with the lack of power the committee has. Can the committee be empowered to (re)direct staff? I am not clear about what the work the committee will do is either. Is it meant to be integrative where the committee is helping empower staff to do better work? Or, is it more check the box – did the staff do this – type work? What is the institutional relationship between the BPS staff, the CIC, and the Planning Commission? A diagram might help flesh these relationships out. For instance, what would be the life cycle of a sample project from inception to completion? Membership on the committee is not well defined. Who will be the members? What are qualifications? I think articulating membership will be important to helping define what the committee can and should do. I am not sure who will actually be willing to put time into the committee without some guaranteed influence. From an equity perspective, I find it problematic to ask people who work on equity issues to spend their already over-taxed time on a weak committee, and given the Bureau’s commitment to equity I would think CIC members with that experience would be a top priority. I think people would be willing to meet more often, if they had more influence.</p>	<p>Changed role of CIC to include responsibility to directly amend the Manual.</p>
	<p>Transparency, monitoring, and evaluation: I am including all three of these concepts together, though they do not necessarily appear nor belong together in the document. I think better descriptions of what these things are and what it will look like to do them would enhance both the main text and the manual. I think these three concepts are a place where Portland has the opportunity to really lead national conversations and learning about what it means to be transparent, monitor processes, and evaluate engagement efforts. To this end, I think both in the main document and manual there should be a more robust discussion about what it means to do effective engagement. This need not be quantitative metrics, but can also focus on qualitative analysis. When planners say we want engagement to be effective, what do we mean? What does it look like? It will vary from project to project, but I think linking up what the overall engagement goals and the project specific engagement goals with some type of outcome and having a narrative about what that looks like could go a long way. The performance metrics in the manual starts to get there; however, I think this could be done in more depth and would be a real asset to helping planners and community members envision what evaluation means abstractly and concretely.</p>	<p>No changes made. There are many metrics available for community involvement, but choosing the appropriate ones for a given project is complicated and project-specific. Reviewing the universe of metrics available and creating a “recommended” list of metrics could be an early activity of the new CIC.</p>
	<p>Balancing Power: I think this comes through in parts of the document, but maybe not as clearly as it would benefit BPS to do so. There are a couple of spots where I think you are alluding to working with more than just neighborhood associations and collaborating with all types of groups. I think you want to call out that historically processes have been dominated by particular groups, and that those groups tend to be property owners with resources (capital and/or political) and from majority populations. I also think it could be to BPS’s benefit to say that many resources have been devoted to these privileged groups at the expense of developing relationships with and capacity in marginalized groups, and that going forward BPS is trying to redress this inequity.</p>	<p>No changes made.</p>

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	I also think you should include language somewhere, and this is where the CIC could play a stronger role, that builds in staff protection from inappropriate expectations from community members as well as unacceptable behavior like verbal abuse. Maybe some sort of community contract can be written as part of an engagement process, and/or the CIC can be tasked with saying when one group has had enough opportunities for input. I think one of the tensions the document raises is how to manage people with power thinking and always getting a say while those without power do not. You are trying to operationalize a response to this, and that is tough work. I would encourage you to tackle it head on and be clear about how this commitment to equity will play out, and how staff should be supported to make this happen.	No changes made.
	Audience: I am not clear who the audience is for the main document. The manual appears written for planners, but should still be accessible for non-planners (it is for the most part). However, I think it would help to clarify the audience for the main document.	Some revisions made to clarify the context and nature of the draft itself and the new Program it creates.
	Editing and Terminology: I think precision of language will be of the utmost importance in this document and it will be time well spent to eliminate future confusion and possible misinterpretation. Terms like "stakeholder," "community," "involvement," "engagement," etc. are not defined and used differently throughout the document with some appearing in one part of a document but not another. I also think there are some parts, some of which I have marked, that would be better served by directly saying what you mean. It would be better to deliberate about that meaning now than have it show up later.	Revised text in response to comment.
East Columbia Neighborhood Association	Too often decisions seem to be made long before the neighborhoods hear about the issues. By the time they are notified the decision is a 'done deal.'	No changes made.
East Columbia Neighborhood Association	Even after notification, there is not enough time for neighborhoods to respond. Input periods frequently fall between neighborhood meetings, which are usually monthly or bimonthly. Neighborhood associations need at least six to eight weeks to consider and make a formal decision. Decisions need time to move from committees, such as land use, to the neighborhood board, to the general membership.	No changes made.
East Columbia Neighborhood Association	Effective community involvement requires a greater effort and emphasis than currently exists on making sure the neighborhoods hear about issues of concern. In addition to the official notifications, there needs to be a central location on the City's website where all issues of concern to neighborhoods are posted, enabling neighborhoods to see what is coming up at any point in time.	No changes made. This project describes a proposed program to support and continually improve community involvement, but does not prescribe specific activities. This is outside the scope of this project .
East Columbia Neighborhood Association	Transparency is vital to community involvement. The citizens need to know that what they say carries weight and is not just meeting a requirement for public involvement. After any hearing, advisory committee meeting, public open house, or other public forum as well as written comment periods, there needs to be a summary report of: what points were made; which of the points were rejected and why; and disclosure of what other persons or entities had input, in both formal and informal communications.	No changes made. This project describes a proposed program to support and continually improve community involvement, but does not prescribe specific activities.
East Columbia Neighborhood Association	Improving public involvement in the City of Portland is key to making the 2035 Comprehensive Plan effective and successful. If we don't make it right this time, there is a problem.	No changes made. This document is not setting any community involvement practices in stone, and is not the only chance to "get it right". The point of the program is to be continually improving, not to set permanent rules that will be effective until the next Comprehensive Plan Update.

Comments submitted to staff on the Discussion Draft of the Community Involvement Program

<p>Eastmoreland Neighborhood Association</p>	<p>These comments are written on behalf of the Eastmoreland Neighborhood Association in reference to the February 2016 Discussion Draft of the Community Involvement Plan. Eastmoreland welcomes the Community Involvement Plan. In fact, we believe that the city would have been well served if this plan had been adopted for the 1980 Comprehensive Plan. We specially support an independent body to offset the public involvement lapses that have been widely commented on. Notwithstanding, community involvement needs to respect Oregon’s standards on open meetings and open documents. We have provided operational language to address these deficits. However, it is difficult to evaluate the discussion draft without resorting to the word “hypocrisy.” Other than the forgoing sentence, our comments avoid this. However, it is important to keep in mind that the word is commonly defined as the practice of claiming to have moral standards or beliefs to which one's own behavior does not conform.</p>	<p>No changes made. This project describes a proposed program to support and continually improve community involvement.</p>
<p>Eastmoreland Neighborhood Association</p>	<p>The Draft Community Involvement Plan is not operational in character. Although it contains the correct sentiments, it specifies few steps to achieve them. These steps should be included in the Proposed Community Involvement Plan.</p>	<p>No changes made. This project describes a proposed program to support and continually improve community involvement. It is not a plan for community involvement, and does not prescribe specific activities.</p>
<p>Eastmoreland Neighborhood Association</p>	<p>Transparency: The word “transparency” is mentioned in the draft eleven times. The actual meaning of the term in the draft is generally left to the surmise of the reader. The closest to a definition is found on page 6: Transparency of Process. Effective implementation of the Comprehensive Plan requires that public processes and decision making is more transparent about how public input and involvement affects plans and investment decisions. Lack of transparency in this regard has been frequently expressed by a wide variety of stakeholders in the Comprehensive Plan update process. Transparency here means making sure the public knows it was heard and making clearer connections between communities’ needs and the outcomes of the project. (emphasis supplied)¹ This is a highly unusual definition of transparency. To paraphrase, the draft indicates that transparency is recognizing input and explaining your decisions. A definition more commonly understood is that all relevant information should be freely available upon request. In the context of Eastmoreland’s yearlong attempt to find the basis of an important staff policy reversal, your colleague, Deborah Stein remarked “That said, I recall that all of our deliberations about Eastmoreland, as one of several R5/R7 areas we analyzed, occurred in group discussions and not via email.”² After a prolonged effort to find the basis of a decision, it appears that “group discussions” are not documented.³ Access to Bureau of Planning and Sustainability documents now must go through the city attorney’s office. A lawyer is required to gain access. Undocumented fees are often charged for meager results. Recommendation: Change the definition of transparency back to the commonly understood definition where all documents and processes are open to the public. 1. Make all documents available. 2. Eliminate the need for lawyers and litigation. 3. Eliminate unnecessary fees.</p>	<p>Revised text to include definition of "transparency" from the 2035 Comprehensive Plan Glossary. The Bureau of Planning and Sustainability, follows a City of Portland protocol to provide access to public record documents. Instructions are provided online, and members of the public do not need legal representation to request documents.</p>

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<p>Eastmoreland Neighborhood Association</p>	<p>Meaningful Community Participation The language quoted from January 20, 2016, above does reference widespread concern over the lack of transparency. A detailed review of these concerns was distributed by the directors and chairs of the seven coalitions representing Portland's neighborhoods.5 I have attached it to these comments. And, of course, the most telling example of the staff's indifference to professionally prepared input needs to be addressed: The king of the Netherlands asks "why, oh why, would one down zone Eastmoreland?" Jon Fink says "Dunno, ask the peckerhead", pointing to me. I lean forward and say "cuz". He says.... FILL IN THE BLANK _____. Amsterdam 2016, gotta go! Sent from my iPad6.The significance of the email is not the insult, but the implication that after the community submitted detailed presentations and professionally prepared testimony, the senior members of the bureau showed both a lack of understanding for the issues and disrespect of their own process. Currently, the Comprehensive Planning staff posts some materials and not others on their web site. Characterization of materials submitted by the community is highly idiosyncratic where greatly differing levels of public support are misrepresented.7,8 Given the Bureau's ability to dominate the discussions before decision makers, it is appropriate for Bureau staff to represent both sides of a debate, not only their own to get a fair decision by decision makers.9 Recommendation: 1. Publically state the policy question including community recommendations. 2. Publish meeting agendas so the public can find out where and when decisions are being made. 3. Invite timely comments. 4. Explain the outcome. Conclusion: While the draft policy has the appearance of meaningful public involvement, it is hardly operational. Past history indicates a lack of transparency and a lack of attention to community inputs. The draft should be changed to make specific changes to improve the situation.</p>	<p>No changes made. This kind of specific requirement is outside the scope of this project .</p>
<p>Multnomah Neighborhood Association</p>	<p>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.</p>	<p>No changes made. The Bureau of Planning and Sustainability feels that it is important to establish a program explicitly intended to support more and better community involvement as soon as the policy requiring it becomes effective.</p>
<p>Multnomah Neighborhood Association</p>	<p>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.</p>	<p>No changes made. The elements of the Community Involvement Program are identified in the document. They are 1) Legislative requirements, 2) Community Engagement Manual, 3) Community Involvement Committee, and 4) Programmatic commitments.</p>
<p>Multnomah Neighborhood Association</p>	<p>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.</p>	<p>The Discussion Draft was released before Council voted on proposed amendments, and thus necessarily was based on language in the Recommended Draft of the Comprehensive Plan. Amendments voted on before the release of the Proposed Draft are integrated into the draft.</p>

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Multnomah Neighborhood Association	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.	No changes made. The word "community" is used to reflect the fact that there are many communities, and individuals may consider themselves members of many communities. It is not intended to indicate that there is no role for individuals. The word "citizen" is not used because it can suggest that legal citizenship is a prerequisite for civic involvement, which is not the case. The choice to replace "citizen" with "community" is intended to open the doors and welcome engagement with everyone. The choice to use "community" rather than "public" is intended to reflect a less formal approach to involvement, and make the process feel less rigid.
Multnomah Neighborhood Association	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.	No changes made. The definition of "recognized organization" for Title 33 does not define the requirements for organizations to be recognized. City Code 3.96 assigns that responsibility to the Office of Neighborhood Involvement, and this proposed change to Title 33 does not affect that. This is why the Comprehensive Plan definition explicitly refers to ONI's responsibility for recognition.
Multnomah Neighborhood Association	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.	No changes made. The Community Involvement Committee is proposed to be staffed by the Bureau of Planning and Sustainability because the majority of projects involving legislative changes to the Comprehensive Plan take place through BPS. The membership and chartering of this committee will be worked out through a process with the Office of Neighborhood Involvement, PIAC, OEHR and other groups that will include community involvement.
Multnomah Neighborhood Association	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.	No changes made. This project is moving through the normal legislative review and adoption process for changes to Title 33.
Multnomah Neighborhood Association	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.	No changes made. The Bureau of Planning and Sustainability feels that it is important to establish a program explicitly intended to support more and better community involvement as soon as the policy requiring it becomes effective.
Southwest Neighborhoods Inc (SWNI)	On March 15th the Multnomah Neighborhood Association sent you the attached letter, which expressed concerns identified in the neighborhood association's review of the Discussion Draft of the Community Involvement Program. The SWNI Board of Directors at their March 23, 2016 meeting voted ten to eight (with two abstentions) to support the Multnomah Neighborhood Association letter. In general everyone agreed that there was inadequate time allotted for public review of the Discussion Draft of the Community Involvement Program document. The two points of concern, which the neighborhood identified as "Citizen Involvement" and "Recognized Organizations" had mixed reviews by board members. Again, the board felt as did the Multnomah NA that there was a lack of opportunity to participate in the development of the Discussion Draft, and the schedule did not allow us sufficient time to review the document.	No changes made. The Bureau of Planning and Sustainability feels that it is important to establish a program explicitly intended to support more and better community involvement as soon as the policy requiring it becomes effective.
University Park Neighborhood Association Land Use and Transportation Committee	1) The Community Involvement Committee should be relabeled as the "Community Involvement Advisory Committee", that would clarify the true nature of the committee which is to assist and inform BPS and the City, not to make independent decisions, undertake inquiries, or approve projects. An alternative term may also be Community Engagement Committee or Community Engagement Advisory Committee.	No changes made. The language in this document follows the language in Policy 2.19.

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University Park Neighborhood Association Land Use and Transportation Committee	2) As a general observation there seems to be a limited role for the Public Involvement Advisory Council (PIAC) and its relationship to this whole process and the CIAC is unclear.	No changes made. The CIC will work with PIAC to share lessons learned and inform ongoing work (page 11).
University Park Neighborhood Association Land Use and Transportation Committee	3) section 740 -- Suggest 45 days notice for hearings be the standard. 30 or 35 is insufficient for neighborhoods and many groups.	No changes made. The change to 35 days is proposed for consistency with state requirements but could change in the future.
University Park Neighborhood Association Land Use and Transportation Committee	Add Drainage, Fire, Stormwater and similar districts to the list of organizations to be notified. Plus there should be a registry (perhaps on-line) for groups to receive notices of all hearings. Such groups could include neighborhood associations, realtor associations, apartment owner/managers, condo associations, environmental groups (Clean Air, Sierra Club, OLCV, 1000 Friends), individual realtors/developers, media etc. Railroads also for all projects within 300 feet.	No changes made. ONI is working on a subscription-based approach to notification. BES, Fire Bureau, etc. are all already involved in reviewing developments.
University Park Neighborhood Association Land Use and Transportation Committee	Add: Notice to be provided in multiple languages (at least on the website) to be decided by ONI	No changes made. The city is already operating under Title IV of the Civil Rights Act. Translation (for documents) and interpretation (for spoken communication) is identified as a need under "Programmatic Commitments." Being too prescriptive in the code could mean locking in requirements that are expensive and may not always be appropriate. This practice, however, could be considered by the CIC.
University Park Neighborhood Association Land Use and Transportation Committee	Add: All notices will be posted on the BPS/BDS website by location and type of notice	No changes made. Being too prescriptive in the code could mean locking in requirements that are expensive and may not always be appropriate. This practice, however, could be considered by the CIC.
University Park Neighborhood Association Land Use and Transportation Committee	4) 910-- support (but it is too limited -- should include other groups and contact names/phones/addresses etc)	No changes made. This proposed change to Title 33 is determined by the definition in the Comp Plan Glossary.
University Park Neighborhood Association Land Use and Transportation Committee	5) Oppose the membership process for the CIC -- the Director should reach out to the neighborhood coalitions, partners, etc for members as well as the Council members. It is too insular a process and does not encourage engagement. The City's approach to citizen participation/community engagement is broken -- this CIC particularly appointed by the Director just perpetuates the problem.	No changes made. No specific membership requirements are laid out in this document. The process of membership recruitment and selection will take place after the adoption of the Comprehensive Plan.
University Park Neighborhood Association Land Use and Transportation Committee	Oppose non-payment for CIC members. Also extensive training, child care, meals, transportation allowance should be provided. One option is to look at the Swedish/Norwegian/Danish model of community involvement where people are paid or stipended etc. and thus have to attend, participate and take it seriously. Even corporate board members are paid. To do otherwise is to create a disincentive for marginalized groups such as seniors, students, single parents, new Americans, ex offenders, handicapped, geographically challenged etc.	No changes made. This is a concern that could be explored in the future.
University Park Neighborhood Association Land Use and Transportation Committee	Meetings should have translators as well.	No changes made. The city operates under Title IV of the Civil Rights Act. Translation (for documents) and interpretation (for spoken communication) is identified as a need under "Programmatic Commitments."
University Park Neighborhood Association Land Use and Transportation Committee	Engagement Manual- good first effort. Concerned about the manual not being culturally sensitive and very linear. No specific tools other than surveys. Not enough attention on how to communicate with the communities (tools, funds etc). No suggestion of best practices -- charrettes, mind maps, community power maps etc. No suggestions of how to engage Academic Institutions in the process. Nor any way of developing partnerships with non profits be they advocacy or service oriented.	No changes made. This project does not prescribe specific community involvement activities; those may be considered through the program in the future.

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University Park Neighborhood Association Land Use and Transportation Committee	No role for ONI? No role for BDS or other government agencies?	No changes made. It is not clear what these roles would be. Other agencies that do not make legislative change to the Comprehensive Plan may choose to use elements of the Community Engagement Manual, and of course other agencies' input into processes will be sought when the legislative actions affect their operations.
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