

2257 NW RALEIGH ST.
PORTLAND, OR 97210



503.823.4288
WWW.PEARLDISTRICT.ORG

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Dear Mayor Wheeler and City Commissioners,

Civic Life's proposed changes to Code 3.96 and the process by which it was determined has served to divide our city rather than uniting it. Instead of working together with neighborhood associations to guide them in finding ways to improve diversity and engagement, and to build partnerships with other groups, Civic Life chose to diminish the neighborhood system and fostered a "them versus us" climate across our city.

The Pearl District Neighborhood Association Board urges City Council to reject the proposed revision in its current form. Please see the summary below explaining our position with particular attention to item #6 that offers a positive solution towards uniting our entire city for the benefit of all.

1. **We need to add more voices and seats at the table of civic engagement:** We agree with this stated intent and goals of the 3.96 Committee. Portland has changed since 2005. There are many new and different types of voices that don't define themselves geographically by neighborhoods – we need to add them to the table and protect those seats in this Code 3.96 update.
2. **The 2016 Auditor's Report and 2008 Community Connect provide the roadmap of how to institutionalize broader inclusivity and diversity in who gets heard and can participate in shaping Portland:** The Auditor's Report and Community Connect recommended keeping the Neighborhood Association System strong, but to expand and supplement it by updating the Code and Standards to formally recognize other groups giving them a voice and guaranteed seats at the table alongside neighborhood associations and be guaranteed notice and benefits similar to what neighborhood associations receive, but modified for their needs.
3. **The 3.96 Committee and proposal went in the wrong direction recommended by the Auditor and Resolution 37373 by dismantling the Neighborhood Association System; no one has a Code-protected seat at the table.** Instead of updating the Code and Standards to add formal recognition to other groups, the proposal dismantles Portland's internationally recognized Neighborhood Association System. Gone are: formal recognition of neighborhood associations and coalitions, the requirement that neighborhood associations must comply with Open Meetings and Public Records rules to be recognized by the City, the Code-mandate that the City and Coalitions must support and oversee neighborhood associations, the requirement that other bureaus give them notice. The Auditor said more accountability is needed; the proposal tosses out the rules meant to ensure transparency, open meetings, notice, inclusivity and non-discrimination, and accountability. Portland is a city of neighborhoods. We need to retain that in the Code and build on it to include communities of color and marginalized and historically under-represented communities.

4. **The 3.96 proposal is only aspirational language; missing are the nuts and bolts definitions and direction the Code needs to guarantee a seat at the table for other groups, but not at the expense of Neighborhood Associations. A lot more work needs to be done.** The proposal is vague and ambiguous aspirational language. There's nothing against which Civic Life's programs and actions can be measured. This cannot be reserved for later-drafted administrative rules which have little process for and guarantee of public involvement. And, the Director of Civic Life, whoever that might be at any given time, should not have sole power to make decisions as stated in the hastily drawn up Section 060 of the proposed language.
5. **The Committee did not comply with the City's Public Involvement Principles and involve neighborhood associations as key stakeholders as required by Code 3.96, the Standards, and the 2035 Comp Plan Chapter 2.** The 3.96 Committee ignored neighborhood associations as key stakeholders and gave no notice or invitation to them of their meetings or draft proposals. The process has led to an unnecessary divisiveness in the city.
6. **There needs to be a new committee with neighborhood associations adequately represented, with a Public Involvement Plan, and within the context of Charter review conversation. Let's take time to get it right.** Neighborhood associations need to be fairly represented and involved as key stakeholders, a Public Involvement Plan is needed, and committee members must be educated on the 2016 Auditor's Report, the Standards, the 2035 Comp Plan Chapter 2, and the City's Public Involvement Principles. The first committee was not educated on the neighborhood system and was tainted from the start - bureau staff and most of the handpicked committee members were pre-biased against neighborhood associations. This is a topic that requires a thorough and transparent public process that cannot be rushed through in only eight months as was just done.

Thank you for your careful consideration of this issue that is of great concern to our city.

Sincerely,

Stanley Penkin
President
Pearl District Neighborhood Association