



Mayor Wheeler
Commissioner Eudaly
Commissioner Fish
Commissioner Fritz
Commissioner Hardesty

July 16, 2019

RE: Proposed changes to Office of Community and Civic Life Code 3.96

Dear Mayor and City Council,

The Hosford-Abernethy Neighborhood District (HAND) is deeply concerned about the proposal by OCCL to remove standards and guidelines for neighborhood associations (NAs) from city code. We believe deeply in government accountability, accessibility, transparency, and inclusivity, and believe the proposed changes are a step backwards, representing an effort to centralize power in a way that is antithetical to our democratic ideals.

NAs differ from other organizations in that they organize people around a specific place. The city needs geographically oriented associations to address issues such as noise, development, transportation, open space, crime and safety, business-resident conflict, liquor licensing, and other issues connected to a specific location. The proposed code changes, as they currently stand, would remove recognition of these unique organizations without offering a replacement system, effectively taking away the most effective voice many residents have on issues that directly affect them.

We agree there are problems with the way the city currently engages with residents -- we have noticed over the years that resident input has been given less weight. We agree that some NAs are less representative than they should be, and some serve only as a sounding board for a narrow range of voices.

But we have also seen the great progress our city can make when officials work with residents to solve problems. NAs are not the only way residents can organize to work with the government, but for any issue that is inherently place-based (as many issues are), they are the most natural way for people to organize themselves. Neighborhood associations are also a source of technical expertise and

experience for interacting with city officials, which can help train and educate members of the public on how public decisions are made, and how to most effectively advocate for a particular outcome.

In 2016, the City Auditor issued a report on ONI (as OCCL was then called), which found that the city's engagement process was proving ineffective, and too many people did not have an adequate voice in shaping city policy. The proposed code changes will make this problem worse. By removing requirements that neighborhood associations conduct themselves in an open and transparent manner, residents will find their associations becoming a less effective way to engage in civic life. Failing to designate any system of public involvement leaves city bureaus freer to focus on the voices of special interests. The net effect of the OCCL proposal is to give Portlanders fewer opportunities to participate in shaping public decisions, accelerating what has been a gradual process of devaluing public input.

There is a better approach. The Auditor's report made several recommendations which the city could implement. For example, the auditor identified the need for NAs to be more inclusive, and in exchange for recognition, we should require them to become so. There are many ways to accomplish this. For example, OCCL could send an annual mailing to all neighborhood residents inviting them to get involved with their association, providing information about their rights to participate and elect board members. Instead, by removing NAs from the code, OCCL will enable NAs to become less representative. For example, some NAs might limit membership by charging dues, or imposing a requirement that all members must own property in the neighborhood.

The Auditor also called for greater transparency and accountability from all groups. Oddly, OCCL responded to this by proposing to drop requirements for transparency and accountability for any group. Surely, this is the wrong approach. OCCL should instead create a set of uniform standards similar to what are currently in the code, and apply them to all groups that want to work with the city.

For a bureau focused on improving outreach and public engagement, the lack of communication with HAND and other NAs has been striking. Neither HAND nor any other NA we're aware of was ever notified of meetings, or invited to participate. The almost non-existent minutes make it impossible to know what was discussed, what ideas were considered, or why the committee decided to focus on dropping recognition of NAs from the code rather than building on an already working system and helping NAs improve.

The hasty schedule seems designed to limit participation and reduce transparency. We are aware of no plans for public outreach once the committee has adopted its final language, which will not be done until its meeting on July 18. OCCL will ask Council to adopt the revised language on September 3rd. Many neighborhood associations, including HAND, do not generally meet in August, so will be unable to provide comments on the adopted draft before it is brought to Council. OCCL knows this. In addition many Portlanders are away during August with their attention focused on other things. We believe this is an indication that OCCL does not want meaningful public input on its proposal.

HAND believes the current draft is fundamentally flawed, and moves us further from an inclusive and transparent system of public involvement. It does not address the flaws found by the Auditor. It does not increase Portlanders' ability to participate in decision making. It does not model good public process and transparency. HAND asks the Council to direct OCCL to follow the Auditor's

recommendations and create a more comprehensive proposal that increases transparency, accountability, and inclusivity, and builds upon our already proven system of neighborhood and business associations.

Thank you,

Chris Eykamp
Chair, Hosford Abernethy Neighborhood District

Board members

Jon Adams
Michelle Sprague
Mark H Linehan

Sue Pearce
Jill Riebesehl
Michael Wade

Charlene Zaharakis
Phil Cox
Kim Nurm

Neighbors

Phoebe Shen
Alejandra Favela
Leann Raschke
Chris Carlson
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