



Honorable Mayor Wheeler and  
City Councilors Eudaly, Fish, Fritz, and Hardesty:

**The Creston-Kenilworth Neighborhood Association urges a no vote on the proposed changes to city code 3.96.**

We support the necessary work that the Code Change committee has done. The strength of a city lies in its diversity of voices, coming together and learning to work in harmony, and we believe that city code should provide equal access to all residents of our city to become involved in shaping city affairs. Neighborhood Associations are one of many ways that residents choose to get involved in civic affairs, and all of those avenues should have equal access to city bureaus. We fear that the current proposal will result in less equitable outcomes than intended and won't fulfill the mandate of the Office of Community and Civic Life. Lack of clearly defined structures will disproportionately benefit people and groups who are already skilled in navigating the existing social and political power structures.

The 2016 auditor's report of the Office of Community and Civic Life (formerly the Office of Neighborhood Involvement) clearly points out what changes are needed to reach more equitable and inclusive engagement.

The following recommendations are from the auditor's report to the Director of ONI (now Civic Life) and the Commissioner-in-Charge, and are not met by the current code change proposal:

- identify engagement needs of the community and city
- define roles and responsibilities of the office
- establish methods for community groups to gain recognition
- delineate equitable funding opportunities for community groups and an achievable methodology for allocating funds
- specify benefits to recognized and funded community groups such as notification and technical assistance
- clearly state expectations of funded community groups

In order to ensure equitable access to and distribution of resources, there needs to be codified structures and processes. Administrative rules are not sufficient to guide the results. It must be provided by the code so that the bureau's structures are not subject to change with new leadership. As the proposed code changes stand now, civic groups are included based solely on the director of the Office of Community and Civic Life's discretion, with no standard public criteria by which a group may petition to be recognized. What happens when the department gets a new director, with different goals and agendas?

The League of Women Voters also published a report asking important questions about how a lack of specificity in the proposed code language may harm the effort to reach equity and inclusion:

"The intent of the City's current Neighborhood Association system is to give every resident of Portland the opportunity to participate in city land-use decisions. This is a requirement of Oregon's Statewide Planning Goals and Guidelines: Goal 1: citizen involvement. How will

Portland residents be given the opportunity to participate in all phases of the planning process, as required by our state land-use laws?

Neighborhood Associations are required to hold open meetings, provide public notice, and post agendas and minutes. This is supposed to give community members who do not have the time or do not choose to participate on a regular basis access to the information they need about how these associations, which are recognized by the City, are acting in the community interest and how the community can provide input. If these requirements that promote transparency are no longer required or effective, then what will be required for community groups to be officially recognized by the City? How will the public be provided avenues to stay informed and participate in a way that ensures a conduit for public input?"

City code should provide clear answers for these questions. The code as currently proposed reads as a very admirable values statement, but a city cannot run on ideals. It needs rules. In order to be fair and equitable, those rules need to be clear and easy for everyone to understand; not subject to change by a bureau director and without public notice. We believe in the good intentions of the current director and commissioner, but what will be the intentions of the next people in those roles? Will they similarly value the diversity of this city, or will they be tempted to assign status on groups that support their personal agendas?

Portland is well-known for its unique commissioner system of government. But because our city commissioners are elected at-large, for decades our city council has been dominated by residents of wealthy west-side neighborhoods. Neighborhood associations are the only avenue that many poorer east-side neighborhoods have to make their voices and their concerns heard. We are concerned that removing legal recognition of neighborhood associations from our city code will not create more equal representation, as proponents intend, but will instead make it easier for groups with more money and resources to dominate city discourse, while pushing poorer neighborhoods without those same advantages even further to the margins. The 2016 audit recommended updating and clarifying standards, not removing them entirely.

Sincerely,

Rachel Davies, Chairperson  
On behalf of the Creston-Kenilworth Neighborhood Association Board