

## MEMORANDUM

**TO:** Michelle Crim, City of Portland Bureau of Planning & Sustainability

**FROM:** Anita Yap, Consultant

**DATE:** December 2, 2012

**SUBJECT:** Equity Policy evaluation of the City of Portland, Comprehensive Plan, November 14, 2012 Draft

Michelle

Thank you for the opportunity to conduct an equity policy evaluation on the City's draft Comprehensive Plan. I commend the Planning & Sustainability Bureau for taking this important step in making sure our long-range plan for the city includes clear goals and policies for equity.

It's important to not only acknowledge Oregon's legacy relating to land, but take prominently into account the current disparities and inequities that are a result of government regulation regarding land ownership, land use policies and regulation. We need to take action to remedy these intentional laws that took land from Native Americans, Chinese Americans, Japanese Americans, African Americans and history that legally denied people of color from owning land in Oregon. We recognize the important role Mexican migrant workers played and continue to play in our agricultural economy and how this has shaped our communities today.

In Portland, we recognize how the leaders in institutions created government regulations that encouraged racism and oppression by allowing slavery, redlining and the role urban renewal and public investment played in displacement of our most vulnerable populations in neighborhoods to the financial benefit of those in places of power and influence.

### ***Prosperity, Resiliency, Livability & Sustainability***

While Portland enjoys national reputation as a livable, sustainable city, equity is not usually part of the headline. In addition, statistics show that the city's prosperity and resiliency suffers due to racial inequality because of lack of access to services, jobs, food, housing, safe neighborhoods, transportation, education and physical and mental health services. Current and future changes in demographics will continue challenge our city in finding new ways to address equity. We continue to see new Portlanders, immigrants and refugees from all over the world coming to our city and old ways of community integration are no longer relevant. We know that inequities and disparities in health, prosperity, health, education and jobs in communities of color have progressively gotten worse from studies from the Coalition of

Communities of Color and the Regional Equity Atlas. How do we assure equity for these new community members and long standing communities of color?

***Equity: Access, Evaluation & Impact***

The word equity should be an all-inclusive term that includes health equity and racial equity and all the components that make up an equitable, resilient, sustainable community. The Comprehensive Plan update provides an excellent opportunity to develop our own equity policy evaluation tool that is applied to goals, policies, action items, plans, programs, land use actions, development permits, capital projects, public investments, prioritization for decision making. Incorporate or include equity in the evaluation criteria, give it priority to address historic inequities and disparities, and address disproportionate burdens that communities of color have suffered, not just from today and in the future.

A suggested framework to think about equity, in terms of the Comprehensive Plan is these three words: *access, evaluation and impact*. The Comprehensive Plan provides the 20-year vision for land use and community development for the City. The plan lays out processes, programs and regulatory goals and objectives to meet the vision. In developing the Comprehensive Plan update, the State regulations require an evaluation of past, current and future needs, forecasts, financial evaluations and priority public investments. Equity considerations need to be an embedded component of process, programs, goals and objectives to meet our community vision.

**Access**

Access relates not only to physical access in the built environment and natural environment, but also in providing individuals a culturally appropriate opportunity to participate in a public meeting or provide input on an advisory committee or testify at a public hearing. For an inclusive and equitable approach to access, it requires an extra step to consider appropriate cultural context for materials that consider what, who, how, when and where the access is provided. What points in a process can an individual access information and provide feedback? How is this feedback and used? How do you communicate?

**Evaluation**

Evaluation relates to how policy, programs, projects and plans are evaluated. A suggested Equity Evaluation Framework Tool is listed below. The equity evaluation component is an integral component of the process, from the initiation of a program, process, plan or project, through the evaluation, priority setting and decision making process.

**Impact**

Impact relates to not only considering impacts on the current situation, but also what are the cumulative impacts that previous regulations and development had on communities? What is the future impact on these disparities, and how will outcomes

be measured? And what can the city do to mitigate or address unintended consequences in the past as well as the future?

There's enough research and information for your staff to use to support equity, among one of the most recent, is the Coalition of Communities of Color, An Unsettling Profile, CLF's Equity Atlas, The Urban League's Racial Equity Guide, Multnomah County's Equity and Empowerment Lens, among others. These documents should be in your staff library and should be used as references for data and priority setting and decision-making at the city.

There has been quite a bit of community conversation, engagement and participation over the last few years for Vision PDX and the Portland Plan. I believe the community has had enough discussion regarding equity and wants to see the Comprehensive Plan advance clear equity actions and outcomes. I recommend the city take immediate action and my recommendations are listed below.

I encourage you and your staff to actively participate in this rare opportunity for professional planners to be on the leading edge of urban concept thinking and leave a legacy of building an equitable, sustainable and resilient community for the future.

## **Overall Recommendations/Comments**

### ***Access***

#### **1. Audience, Format & Content.**

The first priority should be to provide equitable access to the Plan. Who is the audience? How will format and content be equitably presented so a diverse community can understand and access this important vision?

- a. *Refine the Users Guide.* Consider several layout formats, summaries, and language interpretation to help people navigate the Plan.
- b. *Develop an Outreach Plan* for the User's Guide. Develop summary materials, curriculum and focused a range of under-represented community groups.
- c. *Review best practices* for comprehensive plan format, layout and content and above all, equitable user friendliness. Keep the narratives short, and concise, remove regulatory references to appendices and try to keep the Plan under 80 pages. Develop diagrams to show how the Plan fits into the context of the community; other city bureaus, community organizations, geographic and processes.
- d. *Engage an expert editor* that has content, communications and layout background to review and refine the entire document to flow with an eye towards equitable access. The review should be conducted several times as the Plan is refined and revised.

- e. *Convene an Ad Hoc Comp Plan Equity Readers Group.* Solicit 4-5 diverse individuals in the community to read and review the document and provide ideas about culturally appropriate approaches to language, format, content on the draft and final plan and for outreach when the plan is released for public input.
  - f. *Commentary in document.* Based on the Policy Writing Manual, the commentary language will not be legally binding. If the policy cannot stand on it's own without the commentary, more detail or clarity must be added
  - g. *Integrated Goals.* The Integrated Goals do a good job of advancing equity. However, they do not get translated throughout the Plan in each chapter. The Integrated Goals should be integrated, translated and woven throughout the Plan, not only in the introduction and goals of each chapter, but in the policy sections. There should be a clear connection from the policy language that they further refine the goals *Chapter 7, Transportation, provides the best example of strong language for equity, public health, and prosperity.* This section should be used as an example for all the chapters in how to frame the Integrated Goals through equity.
  - h. *Chapter format consistency and cross reference* of similar and complimentary policies. I recommend that specific policies and themes that cross topics and chapters be specifically referenced and reinforced within and between chapters. There should be a placeholder at the beginning of each chapter goals and policies. More specifics are listed below in the detailed chapter discussions.
  - i. *Develop a companion document.* Chapters 6 & 7 are unwieldy, go into too much technical detail and the policy development is contrary to the guidelines in the Policy Writing Manual. I recommend that these two chapters be treated differently than the others by creating a companion document for those policies and keep the high-level goals and policies in the main document, which will help with the accessibility to a diverse set of users. See detailed comments in Chapter 6 section below.
2. Assign each staff person responsible for topic areas or chapters to use an Equity Evaluation Tool (listed below) as they further develop new and refine the comprehensive plan policies and work the PEGs to help further refine the chapters.
  3. Glossary. Develop a detailed glossary. Remove jargon and technical words and acronyms. These words do not provide meaningful access to a wide audience. Define the words listed below in 4.a-y. Some of these words are listed in the Policy Writing Manual, but do not provide enough information about what action the city will take. More detail about these words in context of equity and providing clarity is discussed in 6.a, below and the chapter sections.

4. Equity Context/Relationship. How do we use the word equity? Should we just put the word equity in front of all of the words we think important? Which words should those be? How do we reinforce equity as a common theme throughout the Plan?

General observations show that the word equity is used inconsistently and missing in some place in the goals and policies language. Equity should be the thread that ties all the chapters together. The following words in the goals and policies should always be qualified to have an equity component. Each of these words below implies an institutional system or process that the city uses for civic functions. When any of these words are used in a goal or policy, the author should think how these systems and topics can further equity.

- a. Sustainable/sustainability.
- b. Access. Access related to not only physical and geographical access, but access to services, jobs, transportation systems, in an culturally appropriate manner.
- c. Public investment. Includes not only financial investments, but investments in land use regulations that provide upzoning, urban renewal districts, neighborhood park and other city programs.
- d. Decision making
- e. Priority/criteria
- f. Capacity building
- g. Economic development
- h. Income diversity
- i. Redevelopment
- j. Community involvement
- k. Environmental impacts
- l. Community impacts
- m. Ecosystem
- n. Transportation
- o. Open space
- p. Design & Design
- q. Historic/cultural
- r. Housing
- s. Resource and energy efficiency
- t. Context sensitive
- u. Impacts
- v. Health/healthy
- w. Gentrification
- x. Evaluation
- y. Outcomes

## ***Evaluation***

5. Re-think systems, process, language and institutional procedures that do not address racial equity. Expand, refine and change the approach of the regulations, systems and processes that affect land use decision-making to include equity. If you step back and look how we make decisions on impacts, land use regulations require we evaluate traffic, noise, air, light, and other environmental impacts, but not on impacts to communities that have long suffered from institutional racism, such as placing mobile home parks in floodplains.

A common practice of Euclidian zoning placed high-density residential areas as a buffer to industrial areas or major freeways. Typically, we think of the impact of a new industrial development directly on the adjacent properties, however, we should be taking into account the cumulative impacts that these residential areas have and continue to be disproportionately negatively impacted by these decisions. And we should not be adding more impacts to them does not further the city’s interest in health, welfare and safety of the community. The proposed Equity Evaluation Tool should frame the policy development process.

6. Key words. There are many key words used in the comprehensive plan goals and policies. Many of them are not used consistently within and between the chapters. In addition, I would suggest removing as much jargon and ill-defined words as possible.
  - a. Active verbs, such as *strive, encourage, consider, enhance, maintain, recognize, should, ensure, reasonable, practicable, provide* suggest an action and responsibility of the local government to do take action, such as create a new program, regulation, provide educate or incentive, however, I can’t tell from the policy what that means. The table in the Policy Writing Manual could be further refined and added to the glossary.

Action Verb	Implementation example
Establish or create	Create a new program, new regulation or process, such as design review

The Plan glossary needs to provide a specific definition regarding these words. Words, such as *require, shall, will* are words that commit the city to a specific task or approach. **Use these words in equity goals and policies.** While policy language and legal interpretation vary depending on the circumstances, the city should develop a matrix of these action words and clearly define and commit to what actions or range of actions you are willing to do. The definition of these words in glossary should be clear about the hierarchy and priority of what these words mean in a policy. Through the land use regulatory

evaluation, appeals and project, program or plan development will commit the city to action.

Example policy and question on interpretation: *Encourage development and design that avoids or reduces negative impacts and supports positive outcomes for communities of color.* Does encourage mean that the city will provide incentives? Financial? Zoning or development review or standards flexibility? Expedited review? Design review? Density bonus? Education and outreach with no financial or regulatory benefits? A special award or recognition in the paper?

- b. Consistency in referring to people. The goals and policies vary widely from chapter to chapter relating to referring to “the city”, “the community”, “Portlanders”. I recommend the policies focus on the action, rather than create a separation between the city and the community. We are all Portlanders, we are the community, and we are the city.
7. Develop an Equity Evaluation Tool. As land use planning evaluation of impacts has evolved over time, Dolan/Nolan are now standard evaluation criteria for development review. Other evaluation tools that can be refined to address equity would include the Goal 5 ESEE, Goal 10 Housing Needs Analysis, Goal 9 Economic Opportunities Analysis, Health Impact Analysis, to name a few. The City can develop an Equity Evaluation Tool for development review evaluation, program development, policy evaluation, and public investment decisions. The tool should include a list of items to critically evaluate the policy, program, plan or investment. This tool can and should be applied consistently throughout the entire land use and regulatory program for the city.
  - a. *What are the historic inequities and disparities? What are the cumulative impacts? How do you determine these? Health, economic prosperity, services, social and political, physical environment, education, safety, access, etc.*
  - b. *What individuals or neighborhoods or communities will be impacted by this decision? Increased traffic, noise, air pollution, light, crime, decreased property values, loss of community social networks, crowded schools.*
  - c. *What individuals, groups or communities will benefit from this decision? Increased property values, reduced building permit fees, cleaner air, better transportation system, job opportunities, street trees, parks, and services.*
  - d. *Who decides? Who’s making the decisions? Who provides recommendations to the decision makers? Have these people been selected in an equitable manner? Are they applying the equity*

evaluation tools? Staff, Planning Commissions, Advisory Committees, etc.

- e. *Who is not represented?* Is there and has there been equitable access to the processes that inform and communicate issues to the decision makers?
- f. *How are decisions made?* What process and criteria are used to make decisions? What happens if you don't agree with the decision?
- g. *How will negative effects/impact be mitigated?* Who is responsible for doing this? Who will be making sure this happens?
- h. *How will positive effects/impacts be enhanced?* Who is responsible for doing this?
- i. *What data are you using to make the decisions?* How is this data collected?
- j. *What are the performance measures are you using and how do you track, report and evaluate the outcomes?*
- k. *What are the unintended consequences?* What have we learned from past decisions, such as gentrification? What do we need to do to avoid making the same mistakes? What do we do when we discover unintended consequences are happening?

## ***Impact***

- 8. Implementation Plan. Develop a matrix of policies that provides a cross-reference to where these policies will be implemented, such as amendments to development code, design standards, public contracting rules, capital improvement project evaluation and/or development of a program. The matrix should also include a priority list of actions, how the priorities will be determined and a realistic timeline. This will provide an equitable approach to helping community members understand, participate and influence decision-making. This will also show how the Plan influences and affects not only the policy topic, but other bureaus, plans and processes. While this also relates to access, this component is part of the continuum of how to provide an equitable approach to reaching equity in Portland.
- 9. Commit to first priority actions for equity policy implementation and outcome tracking and evaluation. Recommendations include (and not limited to):
  - a. *Development code amendments that add equity evaluation criteria* for conditional use permits, plan and zone map amendments, legislative changes to the development code and comprehensive plan map.
  - b. Development Code and policies that include *Inclusionary Zoning* requirements.



- c. *Require Equity Community Benefits Agreements* as a condition of public investments of financing, rezoning, in planning studies and program development.
- d. *Clearly articulate anti-displacement policies* and implement by amendments to the development code.
- e. *Public contracting.* Expand the Community Benefits Agreement to include all services contracted with the city. A first step would be to evaluate the professional services contract awards, selection criteria, panel reviewers that the BPS works with. Re-evaluate your list of on-call contractors, do they have equity experience? Are they Minority/Woman Owned and operated? Does the certification of MWESB guarantee that the people doing the work are women and minorities or are there loopholes that do not advance this intention? How do you develop capacity for this in community?
- f. *Commit to refining the city's program evaluation process* to include equity considerations in developing baselines, data collection, setting benchmarks and/or milestones, reporting, evaluation and recommendations for improvements (changes to process, regulations or policies) on a regular basis. Data and recommendations from the CCC's reports are a good starting point. The Urban League's Racial Equity Strategy Guide provides a good example of a Racial Equity Lens for programs, policies and projects, page 35.

## **Comprehensive Plan Chapter-by-Chapter Evaluation**

This section is structured to follow the chapters, with a general overview of recommendations and content discussion at the beginning with a table that references page number and policy or goal number and comment/recommendations.

### **Introduction**

The Vision for 2035 is positive and articulates clearly what is needed for a prosperous, healthy and equitable city. The eight Integrated Goals have a very strong equity theme. The discussion on the eight Integrated Goals gets lost here and never regains the prominence in the rest of the chapters. The Integrated Goals should also flow through the document in a consistent and meaningful way, such as in the introductory text and the Goals for each chapter. I would suggest whomever wrote the Chapter 7, Transportation Goals be charged with writing the Goals for each chapter.

The format of each chapter should provide a tie back to the Integrated Goals whenever possible, as well as between the chapters. The remaining section of the introduction is disjointed and too technical. This should be revised to and most

content reduced or eliminated. There should be a section “Users Guide to the Plan”, that lays out how to navigate through the plan, how to use sections of the plan, cross references to similar and related sections, and maybe a diagram of the systems that Plan intersects and interacts.

Page	Goal/Policy	Comment/Question
3		Use consistent language relating to the City of Portland and Portlanders. Remove references to City of Portland.
7		I’m not sure how these titles Reduce Disparities and Stem Gentrification and Displacement fit into the introduction. Are they Integrated Goals? Narrative? These are important equity issues and should have a place that is meaningful. Perhaps in Chapter 2 & 5 discussion and also develop goals and policies (Chapter 2 has a placeholder)
		The Reduce Disparities paragraph missed an opportunity to cite racial disparities, use the CCC report for key topics.
11-19		This text and discussion is too detailed and disjointed and does not belong in the introduction. The regulatory authority could be put in the companion document or as a summary one-page appendix.

## Chapter 1 Community Involvement

This chapter takes a good approach to redefining public involvement/citizen involvement under Goal 1. There is good intention here on capacity building, using culturally appropriate methods to get community involvement, however, this chapter stops short of recognizing the inequities of community involvement.

Community Involvement chapter needs to include a commitment to change the approach of outreach, involvement and engagement to build capacity in the community to do this work themselves to better inform the decision makers about the needs of the community. This will take some time, as the more established neighborhood groups are organized and there is an inequitable environment of advocacy in Portland. Other areas that have a wide variety of immigrants, refugees and diverse community members will need more support and encouragement to find emerging community leaders. This is already happening in some areas.

Page	Goal/Policy	Comment/Question
12	Goal 1.F	How do you promote “racial and economic integration”? What does this mean and do we want to do this?
15	Policy 1.2	I would not recommend the Planning and Sustainability Commission serve as the officially recognized body to meet Statewide Planning Goal 1. There needs to be a body focused on tracking, reporting and continuous improvement. And a policy

		that states that this will happen
19	Policy 1.7.b	I like this policy to customize the process and be responsive. To the needs of the affected groups. Add: Develop a best practices manual.
21	Policy 1.10	What “expertise” does the community need to ensure informed participation?
	Policy 1.11.a	What actions are included in “feedback loops”?
	Policy 1.11.b	Document and take into account information received through community involvement. What does “take into account” mean ?

## Chapter 2 Housing

The introductory section of this chapter needs to have more content and a strong statement about inequities and health disparities especially in housing access and how the city intends to address this. It is well known that the social determinants of health are directly associated with safe, clean, affordable and stable housing and contribute to success of children in schools and equate to prosperity in neighborhoods. This chapter serves as an excellent opportunity for the goals and policies to tie housing to the chapters on economic development, transportation, public facilities and design & development. There should be more discussion about why households are cost burdened.

The housing section should focus on the ability to influence the market and geographic location opportunities for developing affordable housing through land use regulations, land acquisition, investment, partnerships and providing equitable, culturally competent access to the benefits of public investment in housing provides. Housing equity policies should include:

- Require Inclusionary zoning, such as requiring mixed-income developments in all residential developments.
- Require locational criteria for geographic distribution of affordable housing
- Any public funding or public action (up-zoning, tax credits, SDC credits, infrastructure improvements, etc) that will benefit a property owner to realize an increased value to their property should require community benefits agreements.
- Access to public housing assistance should have culturally competent accessibility, preferences for families with children near schools, culturally focused services.
- Detailed and specific policies relating to gentrification and anti-displacement. There should be a cross reference to Chapter 5 on gentrification, and policies added there as well. Policies and goals should be explicitly articulated in this chapter.
- The gentrification policies need to address housing stability issues, such as rent stabilization, eviction and foreclosure protection.

Page	Goal/Policy	Comment/Question
3	Goal 2A	Add culturally appropriate design to Housing Diversity
	Goal 2B.	Add culturally competent, equitable access , include households that include racial diversity
	Goal 2C.	Location efficiencies should also include equity access.
5	Policy 2.1.b	I don't understand what this policy means and what it implies that the city will do. "Consider the impact of the loss of housing potential through legislative or quasi-judicial actions, particularly the potential to develop housing units that serve low and moderate income households."
	Policy 2.2.e	What does "strive" mean in context of creating a variety of housing types in varying densities that create socio-economically & diverse neighborhoods? How will you do this?
	Policy 2.2.d	What is "what is non-traditional" housing, other than co-housing? Culturally appropriate?
	Policy 2.2.e	Should include range of household types, including culturally appropriate housing design.
7	Policy 2.4.a	Use a stronger word than "Strive". Policy reads: Strive to remove discriminatory barriers, for all people in protected classes in order to ensure freedom of choice in housing, type, tenure and location."
9	Policy 2.5	Are opportunity areas identified on a map? How are these determined? What criteria are used? How is this applied?
	Policy 2.5.b	Add the word "equitable" to the policy "Improve <b>equitable</b> access to active transportation, jobs, open spaces, quality schools, and essential services, in areas with an existing supply of affordable housing."
11	Policy 2.6.b	What should we do if the MH parks are not safe and sanitary? How do we prevent displacement of the people living there?
	Policy 2.7	Gentrification. These policies need to be further developed, placeholder, when will these be ready for review?
	Policy 2.7.a	Do we want to maintain the socio-economic level in established neighborhoods? This policy needs more thought.
	Policy 2.7.b	There should be stronger language than "Consider the potential to cause gentrification/displacement when planning significant new public investments....." Develop criteria to prevent displacement, Focus public investments and tools to prevent.....
13	Policy 2.8.f	How will you reduce the cost burden equitably? What criteria will be used to determine how to prioritize?
17	Policy 2.12.a	Recommend language. " <b>Be the leader</b> in development of regional equity strategies for meeting housing needs of homeless, low and moderate income households....." rather than only "fair share".
	Policy 2.13.d	Define CPTED

### Chapter 3 Economic Development

This chapter needs to have an equity thread throughout. It is missing in several discussion sections and policies. Generally, when the word sustainable is used, add the word equitable, *Equitable Sustainable development*. The economic development chapter should acknowledge that lower income communities are historically unduly burdened with the negative environmental impacts of industrial lands, freeways and other land uses that are considered unfavorable impacts to lower density residential areas. High-density residential zoning should not be used as a buffer to industrial lands. Design and redevelopment and industrial land expansion should take mitigate these historical inequities and seek to reverse these impacts. Context-sensitive design, campus edge design and transitional uses should be tools to mitigate impacts to nearby residential areas and emerging commercial districts.

Page	Goal/Policy	Comment/Question
3	Goal 3A.	Add equitable to prosperity.
5	Policy 3.1	Define economic resiliency, need to be specific about changing demographics and uncertain economy
7	Policy 3.2	Land Development. Include a bullet that states minimizes/mitigates impact on under-represented communities and historical inequities of industrial land development.
	Policy 3.2.b	Land efficiency. Encouraging infill, redevelopment and intensification of scarce urban land should include evaluating equity impacts on neighborhoods that have historic disproportionate impacts.
9	Policy 3.3.c	Urban innovation. Add equity this sentence. Maintain the city’s leadership position in <b>equitable</b> sustainable development, business, services.....”
	New policy 3.3.e	Build capacity with a diverse workforce and equitable allocation of opportunity for workforce training and participation.
11	Policy 3.5 3.5.a	Transportation, public facilities and economic development. This whole section of infrastructure investment needs to state that specific criteria for evaluating equity/impacts/benefits.
13	Policy 3.6.c	Industrial land retention. Conflicts with housing policy on conversion.
15	Policy 3.6.f	Should Central City industrial areas be converted to business or office parks? Should there be more family wage employment opportunities here? Isn’t there a shortage of industrial land? Maybe smaller scale manufacturing that can repurpose buildings and add employment density that can take advantage of the transportation systems and existing infrastructure.
	Policy 3.6.i &	Industrial land intensification and district expansion and public

	3.6.j	investments needs to evaluate equity criteria and mitigate impacts.
17	Policy 3.7.b 3.7.c	Development impacts/Campus Edge. Campus institution development needs to protect the livability of surrounding neighborhoods. This concept should be used throughout the city for transition areas, and include equity design criteria for high density areas, just because an area has multi-family residential, it does not mean that they can absorb more impact from uses, use the same consideration as if it was a historic single family residential area.
19	Policy 3.8	Economic vitality should include economic equity. The word should be used throughout this Policy section.
	Policy 3.8.f	Use a stronger word than “ <b>Strive</b> to prevent involuntary commercial displacement...” Prohibit, prevent, etc
	Policy 3.8.h	Include the word <b>equity</b> before the word “sustainability” in this policy.

#### Chapter 4 Watershed Health & Environment

This chapter is missing the acknowledgment that humans a key component in functioning ecosystems. Watershed health, restoration and biodiversity discussions should also include the impact, influence and management of the natural environment by the Native Americans in the Portland area, in addition to the spiritual and religious significance of fisheries, native gathering areas and wildlife habitat and management.

Many current environmental management techniques are based on traditional Native American practices and continued management of the resources should be in consultation with the Tribes. This chapter should have a human thread that ties watershed health and ecosystem functions to impact, mitigation and who will be conducting the restoration work (workforce training, economic equity, and tie to chapter 3). This chapter should develop similar goals and policies that address Environmental Justice, evaluating of environmental impacts of development, regulations and programs on under-served, low income and communities of color.

Page	Goal/Policy	Comment/Question
3	Goal 4.C	Expand this goal discussion to include environmental justice.
5	Policy 4.2	Define “ecological functions” should include human contribution
	Policy 4.4	Replace technical jargon “anchor habitat”, “habitat complexes”
		Who decides and how will the resources be protected, enhanced and restored?
	Policy 4.6	Define “biodiversity”, should include cultural human interaction and relationship, especially to migratory fish and wildlife species.
7	Policy 4.11	Environmental impact evaluations should include social

		justice/environmental justice evaluation as well. This should be stated here.
	Policy 4.12	When considering impact mitigation, include equity evaluations and priority mitigation.
	Policy 4.14	Define adaptive management.
	Policy 4.15	Cumulative impacts should be defined, this is a good concept to include in evaluation criteria for discretionary applications (CUPs, zone changes, plan amendments) include social impacts, equity considerations.
	Policy 4.16	This policy should include context sensitive design and equity considerations when encouraging intensification of already developed land on communities.
9	Policy 4.19	Urban forest equity, use the word <b>require</b> instead of encourage.
13	Policies 4.29, 4.31	Define scenic and aggregate resources. Is this only the Goal 5 definition or more broadly by the city? I would suggest the definition include a focused definition that includes equity evaluation of adverse environmental impacts.
	Policy 4.32	Mining site reclamation evaluation should include not only surrounding land uses, conditions of nearby lands, public safety. Include evaluation of historical impacts on nearby communities and provide mitigation that addresses

## Chapter 5 Design & Development

This chapter is the strongest component and impact that the Comprehensive Plan can have for reaching equity goals because the built environment has a direct impact on the social determinants of health, prosperity and success of communities. Research has shown that neighborhood design contributes to an individual’s prosperity by how easily they can access to social, political and economic opportunities and resources. Communities of color that are spatially and racially segregated and isolated from economic opportunities suffer from more health disparities, such as a shorter life span and chronic diseases. Design and development should have equity clearly stated as part of priority setting, selection, standards, allocation of resources. The regulatory authority granted by these policies provides the ability of the city to further the public interest and recognize that place; the built-environment and people are all intricately tied together.

Each Goal should include equity as part of design and development concepts. Context sensitive design should also recognize the disparities and inequities and should applied to all areas where residential areas are impacted, not just established neighborhoods. Avoid using jargon, like “typology”, “realm”, “temporal”, “ecodistrict” and replace these words with words that are easier to understand, can stand up under legal challenge and will advance the community’s best interest for equitable access.

Page	Goal/Policy	Comment/Question
5	Goal 5.A	Need to define resiliency as it relates to equity
7	Policy 5.3	This policy should have a stronger word than <i>encourage</i> . “ <i>Encourage</i> development and design that avoids or reduces negative impacts and supports positive outcomes for communities of color, those that have been historically disadvantaged and other vulnerable populations.” Does this mean we will allow for negative impacts? Should we? If so, how will these be mitigated? Anti-displacement and Anti-Gentrification policies should be added here as well.
	Policy 5.4 & 5.5	Leadership in Design. Innovation. Should include leadership in equitable design and innovation in these two policies.
11	Policy 5.6	Avoid the jargon word “typology”
	Policy 5.9	Priorities for investment. The priorities should be not only be based on typology. Add equity as a first priority.
13	Policy 5.14	Context-sensitive design. Do we want to preserve and enhance the character of all neighborhoods through development and design?
	Policy 5.14.a	This policy singles out established neighborhoods, without defining which ones those are and focuses on the built and natural environment, it should also focus on the social component of not only the established neighborhoods, and should focus on those neighborhoods that are underserved.
17	Policy 5.19	These policies should include context sensitive design to adjacent residential areas.
	NEW Policy 5.20.h	Ensure equitable access to services, housing and jobs in Centers.
19	Policy 5.22.a	How will the interface between non-residential activities and residential areas be addressed?
	Policy 5.23	Use another word than <i>Temporal</i> , Provide some examples
21	Policy 5.25	Use another word than Realm
	Policy 5.25.a & 5.25.b	Consider community needs and equitable design when planning for public areas
	Policy 5.28	Provide an equitable distribution of interconnected open spaces.
	Policy 5.28.a	Design open space to be safe, equitable and accessible.
23	Policy 5.29 a-f.	Historical and cultural resources take a narrow view of what is important to protect and restore. (mostly buildings and sites) Include areas that are important, sacred and evolving importance within communities.
	Policy 5.29.f	Why is “under-served” in quotation marks? What does this mean? How is this defined and what are you going to do about it?
	Policy 5.30	Cultural heritage. Change the wording to be consistent with the other policies. “ Identify, foster <del>and enhance</del> <b>protect and enhance</b> cultural heritage structures and sites as valuable and important



		assets.”
	Policy 5.30.b.	Change the wording to be consistent with rest of policies. “Protect, <b>restore</b> and preserve archaeological resources in place.” Are archaeological resources defined? Goal 5 or a broader definition?
	Policy 5.31	Is <b>Significant Places</b> defined? It should include an equity component about who and how these area are determined.
25	Policy 5.32	Arts and Culture. Should include a component about local artists, economic equity in placement, investment and selection of artists.
	Policy 5.32.d	Opportunities to participate should include equitable access.
	Policies 5.33 a-c.	Sustainable Design and Development. This whole section of polices should be rewritten to include the equity component in sustainability.
	Policy 5.33.b	Land division and building siting should include evaluation of reduce disparities people.
29	Policy 5.37	Healthy, Active, Multi-family development policy should include context in neighborhood and geographic location within city as well.
31	Policy 5.41	What does “buffering” mean? Walls? Fences? Landscaping? Open space? Buildings? Parking lots?
33	Policy 5.42.b	Add the word <b>cultural</b> to this policy.
	Policy 5.46	What is a large health tree?

## Chapter 6 Public Facilities & Services

This chapter is significantly different than the previous chapters. From a standpoint of access equity, the content gets too technical and does not further the opportunity to make this document accessible to a range of community members. There is no introduction, the goals are statements that are out of context, and public facilities are not defined. There are other terms listed here that are technical regulatory jargon that are not defined. Urban services boundary, service delivery, unincorporated urban pockets, capital improvement program, service disparities, asset management, geographic responsiveness, climate planning, climate mitigation, hydrologic function, pollution, etc.

The overall content and specific detail do not conform with the Policy Writing Manual, Section E. that states policies should not reference specific actions, however, almost every policy in this chapter references specific actions. An example on page 13, policy 6.8. *Encourage the placement of public amenities and community services such as health clinics, community and senior centers, libraries and community art and educational facilities, in centers.*

The challenge for staff will be to meet the requirements of Statewide Planning Goals and administrative rules for Goals 11, Public Facilities and Goal 8 Recreation that

require the city evaluate, consider, plan and provide adequate of capacity and level of service to meet population forecasts.

This entire chapter needs a thoughtful restructuring, and rewrite of the goals and policies to match the flow, format and content level as the previous chapters. I suggest the city staff determine the best way to present this information with the priority of consistency, user friendliness. Chapters 6 & 7 content and regulatory requirements do not readily conform to the guidelines set up in the Policy Writing Manual (see page 8, Good Policy Examples). A suggested best practice for comprehensive plan format and usability include developing a high level goals and policies document and referencing the detailed “action policies” within the TSP or PFP as a separate, legally binding companion document.

Page	Goal/Policy	Comment/Question
7	Goal 6.A	How are optimal levels of service determined? What are the system and community goals, in this chapter? Is equity a component?
	Policy 6.2	Service delivery of parks and recreation should have an equity evaluation of service levels. Maybe they do, but I can't tell from this section.
	Policy 6.3	Who determines the appropriate level of services? And what does “where feasible” mean?
11	Policy 6.6.d	The capital improvement program should include priority for equitable allocation of projects to underserved areas of the city.
13	All	These policies are action policies and belong in the companion document.
15	Policies 6.12. a.-c	Shared costs. These policies need to state what “costs” mean and evaluate the historic disproportionality of costs some areas have shouldered. This evaluation equation will include more than financial costs.
	Revise policy 6.13	Add in bold. Geographic and <b>Equitable</b> Responsiveness. Add Respond to physical, environmental and <b>cultural</b> context.
	Policy 6.13.b	Add in bold. Allow for site-specific and area specific requirements, tools, and policies that address distinct topographical, geologic, environmental, <b>social and cultural</b> conditions.
	Policy 6.15	Health and Equity Impacts. These are good policies and should be repeated in Chapters 1, 2, 3, 4 & 5, with refined wording to tie these between chapters, as well as address the chapter topic specifically.
17	All	While all of these policies are generally applicable, they are missing the human component of sustainability and need to specifically address equity. In addition, many of these policies are stated and similar to policies in Chapter 4. Use the Equity Evaluation Tool
19-	All	Public rights-of-ways. Keep Goal 6.D, Policies 6.25 Interconnected

23		Network, 6.31 Civic Corridors 6.32 Neighborhood Greenways and revise the language to include <b>equitable</b> ecological design (6.31) and add <b>equitable distribution in neighborhoods</b> to 6.32. Move the remaining policies to the companion document.
27-37	All	Sanitary, stormwater systems, water service goals and policies should be moved to the companion document. In the beginning of the chapter these facilities are already generally addressed.
39	Goal 6.G	Parks, Natural Areas and Recreation. This goal should be refined to add the word equitable and culturally competent access and add wording to support equitable distribution and allocation of parks and programs.
39	Policies 6.64, 6.65 and 6.66	Capital programming, Park acquisition and development, and improvements should all include the Equity Evaluation Tool to evaluate, set Service levels and prioritize capital improvements and program enhancements and reductions.
41	Policies 6.67 & 6.68	Trails and Natural areas should be acquired, developed and managed to benefit not only the environment, but also the public health benefits for the community. Special effort needs to be made to provide culturally appropriate and equitable access to trails and natural areas.
	Policies 6.69, 6.70 & 6.71	Community centers, recreation services, programs and special facilities. I'm not sure what special recreational facilities are. There should be an effort to provide culturally appropriate access to services and programs and equitable distribution and allocation of resources.
45-57	All	Public Safety, Solid Waste, Technology, Energy Infrastructure should be moved to the companion document.
53	Goal 6.J	School Facilities. These goals and policies recognize the importance of schools in neighborhoods. They contribute to neighborhood stabilization. This should be cross-referenced to Chapter 2 Housing and Chapter 5 Design & Development.

## Chapter 7 Transportation

Major portions of the chapter should be moved to the companion document. The introduction is too long and needs to be revised to be consistent with the format, tone and flow of the other chapters. There's good discussion on equity and improving public health. There should be discussion about equitable allocation and distribution of public investments here. The Goals are very solid and provide a strong connection to equity, public health and prosperity.

Page	Goal/Policy	Comment/Question
3	Introduction	Needs to be rewritten to be consistent with the other chapters.
5	All	These are the best example of strong language for equity, public

		health and prosperity.
7-29	All	Most all of these detailed policies should be moved to the companion document.
7	Policies 7.1, 7.4 & 7.5	Connectivity, Pedestrian and Bicycle Classification Systems. These could stay at the higher-level policy description. The classification system should include an equity evaluation to give priorities to underserved areas
11	All policies under 7.12	Street design. These policies could stay and should cross reference to Chapter 2 & 5..These should include the word equitable. “safe, convenient, <b>equitable</b> and comfortable.”
19	All policies under 7.29	Pedestrian transportation. These should stay and cross reference to Chapter 2 & 5. All these policies should include <b>equitable</b> access and prioritize improvements using the Equity Evaluation Tool.
	All policies under 7.30	Bicycle transportation. These should stay. Add the word equitable, “safe, <b>equitable</b> , comfortable and attractive.”
21	All policies under 7.31	Public transportation. Some of these should stay. Add the word equitable in all applicable policies. “ <b>Equitable</b> , safe, comfortable “and attractive. (7.31.d).
	Policy 7.31 g, h & i	These are good transportation equity policies, keep in.
31	Policy 7.39.d	On-street neighborhood parking. This should be cross-referenced to Chapters 2 & 5.
33	Policy 7.39.e	Off street parking. There should be an equity evaluation so that existing disparities neighborhoods are considered.

## Chapter 8 Administration & Implementation

This chapter is one of the weakest chapters of the Comprehensive Plan. The chapter should clearly outline how the Plan will be implemented. What associated plans, procedures and programs will be affected, created or amended? Which bureaus and other agencies are responsible for certain aspects of the Plan? Associated bureaus include PBOT, BDS, BES, Parks, PDC, PHB, ONI and any other outside agencies that receive public funds or benefits from city action.. This chapter should also define the responsibility of BPS in monitoring, reporting and evaluating the benefits of public investments and regulatory programs beyond the requirements under Statewide planning regulations.

Page	Goal/Policy	Comment/Question
3	Goal 8.D	Cost of regulation. How will the cost of regulation be determined to evaluate the balance the benefits and avoided impacts? What metrics will be used in the balancing equation. This cannot be an “apples to apples” comparison and the historic disparities and

		equitable distribution of benefit must be evaluated.
	Goal 8.E	Efficient and streamlined development review process and effective communication. This goal appears to favor the developer in the process and does not define how to determine efficiency or effective.
5	Policy 8.3	Infrastructure capacity should not be the <i>principal factor</i> when determining land use designations and densities. Equitable benefit to communities should also be a principal factor.
9		Infrastructure Plans. This section is confusing and should cross reference back to chapters 6&7 about how, who and what the implementation of these plans will happen and assurance that equity will be a principal factor in these plans.
11	Policy 8.8	Inventories and analysis. This policy should be strengthened to include collection of data beyond state regulations for BLI, EOA, NRI, and HNA. What data and analysis should be collected? I recommend PEGs Use the information provided in the Equity Atlas and the CCC's report and decide what data should be collected, reported, analyzed for effectiveness and efficiency of public policy in this plan.
13	Policy 8.11a	This policy should be expanded to have other considerations than just schools when making legislative zoning decisions. This would be the opportunity to apply the equity evaluation tool.
17	Policy 8.12	Note there is a typo here on the numbering of the policies (should be <b>8.12.a, 8.12.b</b> ) currently numbered 8.15.a, 8.15.B
	Policy 8.15.a	This policy should be expanded to include establishing design review for areas subject to gentrification and other vulnerable areas. This also suggests that there should be policies in Chapter 2 and Chapter 5.
	Policy 8.15.b	This policy should be changed to have the same language 8.15.b. <b>Establish design review requirements to</b> parts of Portland ...There should be an equitable application of city resources to design review to areas that are expected to experience significant change, which should be reworded to experience gentrification.
19	Policy 8.15	Add equity language as the first bullet. <b>Assure that equity receives the highest priority in evaluations of amendments to the Zoning Code.</b>
	Policies 8.15.a	This policy should include an equity statement as the first bullet and could be combined with the second bullet. <b>Addressing past and present disparities and inequities and anticipating future unintended consequences.</b>
21	Policy 8.16	Capital Improvements Plan. Developing and maintaining the program should include an equity evaluation in process, criteria and project selection of capital projects for the city.
		Other Implementation Tools. This paragraph should relate directly back to all the Chapters goals and policies. Should explain

		what these tools are, how they will be applied, who determines which tool to use and how an equitable process will be developed to make these decisions.
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