

The first task in response to to see if the City's "Workshop Plan" is adequate. Please note the many activities taking place prior to Nov 13 when the letter was received (I) we were told that the public call NOT attend nor see the notes from these meetings

	2007	AUG	SEPT	OCT	NOV	DEC	2008	JAN	FEB	MAR	2009	MAR	2010	MAR (or later)
PUBLIC OUTREACH	<ul style="list-style-type: none"> 1. Brief P+D • Approach to visionPDX and Portland Plan • Need for participation of leadership in Technical Working Groups (TWG) 	<ol style="list-style-type: none"> 1. visionPDX at Council on 9/19 2. Hire staff 3. Complete draft Central City UD Assessment consultant 4. Issue RFP for CPP 5. Grant request to DLCD 	<ol style="list-style-type: none"> 1. Receive periodic review letter from LCDC 2. Complete hiring staff 3. Select CPP consultant 	<ol style="list-style-type: none"> 1. Work session P/C/C draft process and draft proposals 2. Develop work plan 3. Work elements and public outreach 4. Release CPP assessment 	<ol style="list-style-type: none"> 1. Draft public work plan 	<ol style="list-style-type: none"> 1. Work session on workplan with PC 2. Review work plan 3. Brief P+D 4. Appoint CPP committee 	<ol style="list-style-type: none"> 1. PC hearing on workplan 2. Develop work plan 3. Brief DCC(?), SDC(?) 4. "Public Ideas" summit; focus on sustainability 	<ol style="list-style-type: none"> 1. Public review and City Council adoption of workplan for LCDC 2. Present Portland Plan outreach strategy 3. Present Portland Plan framing concepts, draft goals, critical questions • Concept for village centers • Role of education + neighborhoods • Economic development strategy for the city 	<ol style="list-style-type: none"> 1. Council considers draft policy proposals: Recommended: <ul style="list-style-type: none"> • Urban Form Plan • Major changes to Comprehensive Plan Policies • Central Portland Plan • Draft Capital Systems Plan 	<ol style="list-style-type: none"> 1. Council adopts plans 				
	<ol style="list-style-type: none"> 1. Consultant / Portland Plan message 2. Lessons from visionPDX 3. PCLand use conclusions 4. Conversation about infill conclusions 	<ol style="list-style-type: none"> 1. Briefings with interest groups: <ul style="list-style-type: none"> • Central City • Land use chairs • District coalitions • Other 2. Publish Portland Plan "storefront guide" in paper and web versions 	<ol style="list-style-type: none"> 1. Public outreach on DRAFT Workplan 	<ol style="list-style-type: none"> 1. Public outreach on DRAFT Workplan 	<ol style="list-style-type: none"> 1. Update storefront guide (APRIL) 									
INTERBUREAU WORK	<ol style="list-style-type: none"> 1. Organize Technical Working Groups <ul style="list-style-type: none"> • Urban Form • Economic Development • Housing • Environment • Infrastructure • Sustainability 	<ol style="list-style-type: none"> 1. Start meeting with some of the TWGs <ul style="list-style-type: none"> • Economic Development • Housing • Environment • Infrastructure • Sustainability 	<ol style="list-style-type: none"> 1. TWG meetings 	<ol style="list-style-type: none"> 1. TWG meetings 	<ol style="list-style-type: none"> 1. Draft TWG report 	<ol style="list-style-type: none"> 1. Draft interbureau work process for upcoming year 								

Subject: Re: LCDC meeting

From: Mark Bartlett <mbart@pacifier.com>

Date: Mon, 28 Apr 2008 11:48:50 -0700

To: DDerby@aol.com, Paul Leistner <paulamy@teleport.com>, Pat Wheeler <pwheeler@coas.oregonstate.edu>, Jonah Paisner <jonah@paisnerlaw.com>

Dennis,

Paul and I were going to come down to speak before your meeting on Thurs or Fri. Do we have a time certain for public comments or contributions? I will appreciate any help in determining what subject matter we should present.

There are so many issues I have with the way this has been conducted I don't know where I should start. Since it started so improperly it can never be corrected now unless we begin anew.

It was and remains my opinion they planned to limit citizens participation and effectively have done so. I view this as the same dog and pony show bureaus have offered in the past, not a true collaborative effort in any sense of the word. The public is completely reactive to the recommendations of the policy makers who constructed theirs without any public scrutiny or participation.

Paul has attempted to make the best of a bad situation, but Planning has been reluctant to move off they track they have determined it must follow. I am not the PI expert, but coincidentally Paul has advanced degrees in that from PSU, so I defer to him on these matters.

1) They knew years ahead that they would get this letter, but failed to construct a process in anticipation. Ironic for a Planning Bureau...to not be able to plan accordingly. They only began to do so after approving funding in November. This was months along into the policy discussions and technical work that becomes the evaluation and work plan.

We were completely shut out of that process in spite of my personal and written efforts dating back over a year. They then did not include me on the e distribution list from Oct through mid Feb...this after my face to face meeting with Steve Dotterrer and the Mayor, both who assured me I would be notified of developments.

2) I have addressed in all three of my letters to Mayor Potter, that the evaluation of the PI process "to see if it is adequate" is the very first step in responding. That is difficult to do if there is not one to evaluate. I have requested the policy as written and have no response to date. Planning has not made any move to correct this, and remains without any comprehensive written plan to my knowledge. They are making it up as they go.

3) I maintain that "All Phases", includes the evaluation and work plan. I believe this is critical as those are the most important items in allowing the public participation so that it is meaningful. Simply responding to the offerings of the Bureaus is not meaningful. And that the work product from the earlier meetings that we were shut out of, be posted to their web site as is necessary according to ORS 192 open public meeting laws. Even after months of requesting this they are not responsive, instead saying they were internal meetings and did not have any minutes or notes taken. Am I to believe everyone memorized all discussions and direction to conduct future efforts on those topics?

Paul did speak to Mayor Potter two weeks ago about this lack of proper PI and he said he was going to ask Planning to act, but I have not had any news that they are doing anything different of note.

4) They represent that the Planning Commission has the authority to represent the 1.5 million regional citizens who are affected by this review. That is now eight people who are quite busy with many other projects as well. How can they represent us while occupied with their normally heavy work load?

The Planning commission met on 22 April for a brief discussion about the evaluation. I fear this may be the only planned public meeting as that is all that is required by statute... The Evaluation was released on 1 April, discussed 22 April at the Planning Commission hearing, just meeting the notification requirements of 21 days in the statute... Again the barest of efforts in the shortest time frame allowed, and that is if the Planning Commission is approved to replace the public in this process...

To my knowledge the meeting was not widely made public through the media, and not many showed up to comment. (The agenda was posted to the Planning web site) This was evidenced by the number of copies of the evaluation BOP brought and then took home... I suggested to Christine that this was additional evidence that the public notification was lacking, and they should try again.

5) I anticipate that many planning projects are slated to be included into this comprehensive Portland Plan, so that once ratified by council, the comprehensive package will be approved. Whether or not the public knew of or participated in the construction of them.

An example is the 2035 state RTP from Metro, another will be the long range facilities plans by PPR and PPS. There are as many as a dozen more... The public is not aware that these are now in planning and are not party to the discussion. Metro has already assumed they will be granted their extension and is planning accordingly. (see their web site)

However, the June 6 topic of sustainable development is the big item promoted by the Bureau on a work day, when few will be able to attend. How many average citizens will take off work to attend? How many mother with kids will pay a babysitter to go... you see the point. Amanda Fritz (city council candidate and former Planning Commission member) brought this point up at our council testimony on this subject suggesting this was not an adequate effort. The bureau promotes this as the highlight of the effort.

They have additionally scheduled further meetings to discuss this presentation in May and June.

I don't see that as a large topic, and do see facilities plans and transportation plans which lead to important land use results, as being the larger discussion that requires public scrutiny and input. We are not participating in those policy decisions, nor are they public knowledge. A very small select group of individuals is calling the shots out of the light of day. Those will be the issues that impact our everyday life, and we are being excluded from any discussion about what Metro and BOP are deciding to place before the public. We can only respond.

Planning has also placed some surveys on their web site, spread far and wide, on different topics. This would allow additional numerical responses, to bolster their claim to have conducted a thorough effort.

I did ask Christine Appleberry to delay the Survey deadline (May 16th) until that time; they publicly announced it was on the site for interested parties to respond, (I suggested 60 days from the public announcement) until they consolidated them so one could find them all and construct a comprehensive response, until the survey was made available to all (it is only through Portland online which requires a log in) and then the results be put before the Planning commission for public comment and review. A small request, but again so typifies their effort to minimize...

I did ask Steve what their plans were if they were not granted permission to substitute the Planning Commission for the citizens committee in the PI process, and what would happen if they were not granted an extension? No response was sent. I do think this needs to be restarted in a proper fashion (according to the statutes, goals, the DLCD's own Guide to Responding, and even the existing PDX Comp Plan), once the written Citizens involvement process is completed and in place. I would like to see a citizens committee (not one with the usual suspects) formed to participate in the policy discussions and work done to evaluate the current Comp Plan and construct the work plan. If City Councilor Adams can appoint a citizens committee to participate in the lighting design for the CRC bridge that may never be built, certainly we can do so for such an important task as this.

Thank you for your concern,
Mark Bartlett

DDerby@aol.com wrote:

Mark,

Any progress on your issues?

Dennis

Need a new ride? Check out the largest site for U.S. used car listings at AOL Autos
<<http://autos.aol.com/used?NCID=aolcmp00300000002851>>.

Information from ESET Smart Security, version of virus signature database 3060
(20080428)

The message was checked by ESET Smart Security.

<http://www.eset.com>

Subject: LCDC meeting

From: Mark Bartlett <mbart@pacifier.com>

Date: Wed, 26 Mar 2008 11:53:38 -0700

To: dennis <DDerby@aol.com>, Pat Wheeler <pwheeler@coas.oregonstate.edu>, Jonah Paisner <jonah@paisnerlaw.com>

Hi Dennis and Pat,

I wanted to hear what if anything was discussed as far as our problems here, with the citizen participation.

Things have not materially changed for us. The bureau is making an effort to say the right things, but it does not translate into anything that will provide a significant opportunity. Paul is working hard with those in the Bureau to bring some opportunity for us, but the evaluation period is almost complete and still no process in place.

I think this was their plan all along. After all, we are entrusting this bureau to "plan" our future going out 30 years, and they fail to plan for a request they know they are getting until it is too late for real participation. I think that says it all.

It seems DLCD is not going to even offer an assist if that is their place. I stopped corresponding with Meg after that sorry email she sent me. I thought it a waste of my time, if that was who they thought should represent such an important review for the state and the city.

I am still troubled by the fact that Richard worked for Ball Janick, who are very prominent with the inner circle (political and developers) here that run land use issues and make policy decisions. I don't know him, so I cannot make a judgment on whether to be concerned.

That same group in 2002 formed a non profit called the Real Estate Trust (RET) who are determined to sell our public lands, such as schools, in spite of the language in the PDX Comp Plan which says, the bureaus are only stewards, not owners, and that they belong to the public.

It is this same inner circle that holds sway with council on policy and forward planning.

We are all trying to show just what a conflict of interest this is, but the Mayor and council seem to know this, and are not willing to upset the status quo.

Schools and Parks are constructing a long range master plan for facilities (I've been told by a planning contact at Metro), but will not disclose just what those plans are. We interact closely with PPR since they attempted to sell part of our Mt Tabor Park 18 months ago. (Jim Francesconi was party to this, and now he is in Salem with Higher Ed.)

These two bureaus hold the majority of public property within the city limits, that will be subject to any new rules or codes in the Comp Plan.

I have been requesting this master planning information, but PPS needs to first adopt their new facilities assessment by Magellan. If they disclosed now, this would blow the lid off of their plans for the future, by showing which schools they retain and which they close and sell. Then they would never be able to adopt this facilities analysis. The public outcry would be large and loud, and likely their proposed Bond would fail.

The RET has an exclusive agency agreement for the disposition of PPS properties. They benefit greatly from this relationship in many ways, and their financial records are not open for public scrutiny. Properties are often sold at a discount to assessed value, and they benefit from their own recommendations of which properties to dispose of, made to PPS.

They then get paid a salary, a bonus, benefits, 1% of value for the sale, and 1% of value to manage the property. Costs and fees as well as the possible agent commissions are outside the compensation structure. Add it all up and it far exceeds a traditional transaction fee structure. The conflicts of interest are very plain to anyone who cares to read this agreement, which by the way was prepared by S Janick.

The only way a citizen could gain access to the RET financial records, is to be elected to the PPS board. (I do have copies of this agreement)

The city does not now control PPS properties directly. The statutory control rests in Salem, unless a council member happens to take a personal interest. But this land lies within the city proper.

I tell you this as it is our opinion that these and other important changes and events are being prepared to come together under an umbrella known as the Portland Plan. Citizens may only see a very small part of what the bureau is doing. Citizens may then approve only that part, and then we expect council to adopt the new components which we have never seen, as part of the comprehensive Portland Plan.

We feel they will attempt to sanction these other arrangements under the council approval of the PDX Plan.

In my opinion these are among the reasons why the bureau will not allow our participation... If they did we could see just what they were up to.

I feel that is also why I was denied access to the policy and tech work groups back in November, and why they will not post meeting work products publicly. I began writing to request involvement over a year ago and have e mail documentation.

Thanks you for your advocacy for our citizens,
Mark

Subject: RE: updating comp plan
From: "Torgerson, Leanne" <TorgersonL@ci.portland.or.us>
Date: Thu, 15 Mar 2007 16:59:39 -0700
To: 'mbart' <mbart@pacifier.com>

Mr. Bartlett -

Thank you for your email. I understand you are interested in participating in the comp plan process. The comp plan process is under the authority of the Bureau of Planning and I have forwarded your email on to them. You should be hearing from Bureau of Planning staff soon.

Thanks,
Leanne Torgerson
Director's Executive Assistant
Bureau of Development Services
1900 SW Fourth Avenue, Suite 5000
Portland, OR 97201
503.823.7937
503.823.7250 (fax)
torgersonl@ci.portland.or.us

-----Original Message-----
From: mbart [<mailto:mbart@pacifier.com>]
Sent: Thursday, March 15, 2007 11:34 AM
To: Torgerson, Leanne
Subject: Re: updating comp plan

Leanne,
When I spoke to Paul and Gill at the budget meetings, I was requesting to participate, not simply be informed about the process. I have been involved in real estate and development for 15 years in Portland. I am familiar with the building codes (I recently completed a new home for myself) as well as the LUR process (I am finalizing engineering for a 5 lot application now). I am on the MTNA board and land use committee. Please let me know when you will choose the citizen participants. Thank you,
Mark Bartlett

"Torgerson, Leanne" wrote:

Mr. Bartlett -
Thank you for your interest and email dated 2/28/07. I am acknowledging to your email on behalf of Paul Scarlett. I have also forwarded your email on to the Bureau of Planning as they maintain the elist and coordinate the comp plan information. I have asked them to follow up with you on your request.

Leanne Torgerson
Director's Executive Assistant
Bureau of Development Services
1900 SW Fourth Avenue, Suite 5000
Portland, OR 97201
503.823.7937
503.823.7250 (fax)
torgersonl@ci.portland.or.us

-----Original Message-----
From: mbart [<mailto:mbart@pacifier.com>]
Sent: Wednesday, February 28, 2007 3:13 PM
To: bds@ci.portland.or.us

Subject: RE: comp plan review
From: "Ames, Betsy" <bames@ci.portland.or.us>
Date: Thu, 10 May 2007 16:34:26 -0700
To: 'mbart' <mbart@pacifier.com>
CC: "Dotterrer, Steve (Planning)" <sdotterrer@ci.portland.or.us>

Mark - We very much appreciate your willingness to participate. I was waiting to respond until I had the opportunity to connect with Steve Dotterrer, the Principal Planner for the division that will be leading the Comp Plan update work which should start in earnest in late Summer/early Fall. Steve was out of town for several weeks, and is catching up now on a number of items, so we haven't had a chance to talk about how the public involvement component of that project and any advisory committees will be structured - since we don't have a lead planner for the project yet, I suspect that will not be determined for several months. I'm copying Steve on this e-mail so that he can get your contact information and let you know when things are better defined.

Thanks, Betsy Ames

-----Original Message-----

From: mbart [<mailto:mbart@pacifier.com>]
Sent: Thursday, May 10, 2007 1:42 PM
To: Ames, Betsy
Subject: comp plan review

Betsy,

A few days ago, I was referred to you by Ty Kovatch, in Commissioner Leonard's office. I believe he forwarded my correspondence to him, about participation as an informed member of the public in this review. I believe they could vouch for my willingness to participate and ability to understand the information. I have sent a few e mails about this to BDS and Planning, and have not gotten a response, simply an acknowledgment that it was received. I would appreciate the opportunity to participate. I work at home, and am available days or evenings. Thank you, Mark Bartlett

Subject: RE: comp plan review
From: "Kovatch, Ty" <tkovatch@ci.portland.or.us>
Date: Mon, 7 May 2007 10:48:59 -0700
To: 'mbart' <mbart@pacifier.com>
CC: "Kelley, Gil" <gkelley@ci.portland.or.us>, "Ames, Betsy" <bames@ci.portland.or.us>

Mark--

The Comp plan review would be undertaken by the Planning Bureau, which is under the authority of Mayor Potter, so Gil Kelley's or the Mayor's office is the appropriate contact for this.

Gil and Betsy--would you mind connecting with Mark?

Thanks,
Ty

-----Original Message-----

From: mbart [<mailto:mbart@pacifier.com>]
Sent: Monday, May 07, 2007 10:47 AM
To: Kovatch, Ty
Subject: comp plan review

Ty,

I have been asking BDS about getting involved with the comp plan review since the city budget hearing in Feb. I expressed my interest to Gil Kelly and Paul Scarlet at that meeting, and was told to contact them by e mail.

I'm not getting any meaningful response to my numerous requests.

I'm on the MTNA board and land use committee and have done development and building for 25 years. I even have my own LUR under way currently and just finished building my own home as contractor.

I've built and owned many properties, both residential and commercial (in three west coast cities). I had over 60 apartment units until a couple years ago, so am familiar with the issues in both zoning and building, for new and existing construction. I thought that would provide a well rounded view as a public participant. And I don't have any particular interest that would influence my perspective.

Thank you,
Mark Bartlett

Subject: RE: planning/ mayors staff

From: "Valenzuela, Veronica" <vvalenzuela@ci.portland.or.us>

Date: Thu, 20 Sep 2007 17:01:26 -0700

To: "Kennedy-Wong, Elizabeth" <Elizabeth.Kennedy-Wong@ci.portland.or.us>, 'mbart' <mbart@pacifier.com>

Hi Mark,

I have asked the Planning bureau to give me a contact name and number and I will pass it along as soon as I have it.

Good to hear from you,
Veronica

-----Original Message-----

From: Kennedy-Wong, Elizabeth

Sent: Thursday, September 20, 2007 10:01 AM

To: 'mbart'

Cc: Valenzuela, Veronica

Subject: RE: planning/ mayors staff

Hi Mark,

Veronica Valenzuela is the liaison to the Bureau of Planning for the Mayors Office. I am not sure what you are referring to specifically, but do know they are working on updating the Comprehensive Plan and the Central City Plan - both may include zoning.

I am sure Veronica will know more.

E-

Elizabeth Kennedy-Wong
Community Engagement and Public Involvement Manager
Portland Parks and Recreation
(503) 823-5113

-----Original Message-----

From: mbart [<mailto:mbart@pacifier.com>]

Sent: Wednesday, September 19, 2007 10:10 AM

To: Kennedy-Wong, Elizabeth

Subject: planning/ mayors staff

Hi,

Who would be the appropriate contact in mayor Potters office for issues regarding planning?

There (is) will be a reexamination of the planning/zoning code and I would like to participate. I've been contacting Betsy Ames (per Ty) without much in the way of a useful response, but did not want to miss the application for further participation.

Don't want another committee with the usual suspects to rewrite, without some real members of the public participating. Planning begets more planning and it does not always benefit the public.

Thought my personal experience with bureaus of building, BES, BDS, and development experience, etc... would be a good fit. Mark

-----Original Message-----

From: Kennedy-Wong, Elizabeth
Sent: Thursday, September 20, 2007 10:01 AM
To: 'mbart'
Cc: Valenzuela, Veronica
Subject: RE: planning/ mayors staff

Hi Mark,

Veronica Valenzuela is the liaison to the Bureau of Planning for the Mayors Office. I am not sure what you are referring to specifically, but do know they are working on updating the Comprehensive Plan and the Central City Plan - both may include zoning.

I am sure Veronica will know more.

E-

Elizabeth Kennedy-Wong
Community Engagement and Public Involvement Manager Portland Parks and Recreation
(503) 823-5113

-----Original Message-----

From: mbart [<mailto:mbart@pacifier.com>]
Sent: Wednesday, September 19, 2007 10:10 AM
To: Kennedy-Wong, Elizabeth
Subject: planning/ mayors staff

Hi,

Who would be the appropriate contact in mayor Potters office for issues regarding planning?

There (is) will be a reexamination of the planning/zoning code and I would like to participate. I've been contacting Betsy Ames (per Ty) without much in the way of a useful response, but did not want to miss the application for further participation.

Don't want another committee with the usual suspects to rewrite, without some real members of the public participating. Planning begets more planning and it does not always benefit the public.

Thought my personal experience with bureaus of building, BES, BDS, and development experience, etc... would be a good fit. Mark

The public appears to be precluded from this most important step. I don't see any public involvement, but something called outreach. The vision PDX survey report cannot alone be considered public participation. It appears that is what planning is doing.

Where is the involvement of the neighborhoods? Our boards and land use members are the sounding board for the public. We hear from neighbors monthly about problems and issues that are concerns needing to be addressed through this plan. When do they get to constructively participate in a meaningful way? After planning professionals create a process for which this public input will not be able to be considered?

I'll admit that this is a very large task and that specific skill sets are going to be needed, but I don't think relying on a visioning document will provide the outcome most of the public will understand as evolving from their input. I see this document as an overwhelming amount of information that can be used in any fashion the task force sees fit.

And in a typical bureau fashion, the most important component of any process, developing the scope of work, and language for the staff hires and consultants, is left to the bureau or planning professional without any input from the public.

I'm certain you realize that these early activities often direct the participants toward an outcome (generally speaking) and do not necessarily reflect the concerns of the neighborhoods (specifically).

Is this what the Mayor's office sees as a good and legitimate process. After all we are all going to be impacted by this resulting Plan as well as living with the results for years to come. Simply having a few thousand people fill in a survey does not legitimize that as a public process. It provides some direction, no more.

We need and want more than outreach that will "inform" the public as to the direction BOP is moving. That does not allow an interactive participation from neighborhoods and concerned citizens.

I thought we just demonstrated that early and meaningful discussion can yield a better product and relations with a bureau.

I hope the Mayors office can make this part of public involvement more clear to BOP staff.

Thank you,
Mark Bartlett

"Valenzuela, Veronica" wrote:

No problem Mark.

-----Original Message-----

From: mbart [mailto:mbart@pacifier.com]
Sent: Monday, September 24, 2007 2:48 PM
To: Valenzuela, Veronica
Subject: Re: planning/ mayors staff

Veronica,

Thank for the response.

I have a couple responses but they were the "appreciate your interest, we'll let you know " sort. I did correspond with Betsy a couple times in the early summer, with my understanding that this would begin right about now. I appreciate your assistance. Mark

"Valenzuela, Veronica" wrote:

Hi Mark,

I have asked the Planning bureau to give me a contact name and number and I will pass it along as soon as I have it.

Good to hear from you,
Veronica

Subject: RE: planning/ mayors staff

From: "Valenzuela, Veronica" <vvalenzuela@ci.portland.or.us>

Date: Wed, 3 Oct 2007 08:55:47 -0700

To: 'mbart' <mbart@pacifier.com>

CC: "Wendt, Liesl" <lwendt@ci.portland.or.us>, "Egbert, Whitney" <Whitney.Egbert@ci.portland.or.us>, "Kennedy-Wong, Elizabeth" <Elizabeth.Kennedy-Wong@ci.portland.or.us>

Hi Mark,

Thanks for expressing your interest and concerns. I can assure you that the Portland Plan process, including the Comprehensive Plan update portions, will have significant community involvement throughout the planning process. The work will build upon (but not be limited to) the extensive input received during the visionPDX process, and will have multiple opportunities for residents, employees, neighborhoods, non-profits, businesses, and others to get involved in a meaningful way to discuss, debate, and form the real choices that need to be addressed as we look forward to the future.

Bureau leadership has already started going out to the district and coalition offices to seek input on the process, asking for feedback on whether it makes sense to combine the various efforts (Urban Form Plan, Economic Development Strategy, Comprehensive Plan Policies and Goals, and the Central Portland Plan, among others) into one "Portland Plan", asking for input on the public involvement strategies, and getting input on topics of interest and concern in the community. This work will continue as the workplan gets developed and is reviewed by the Planning Commission and City Council in the spring.

We've heard a lot over the past several years about the need to have a coordinated and time effective way for Portlanders of various backgrounds to get involved and participate in City projects. There's a lot of varied projects that Planning is working to pull together to provide people with different "points of entry" to our long range and strategic planning efforts - they are working to make it easy for folks to plug in whether they are interested in a particular policy area (e.g. environment, economy, etc.) or a specific geographic area of the city (their neighborhood, their community, industrial areas, the central city, etc.) or a particular bureau's activities, etc. There are multiple communities and multiple interests - the bureaus, working together with the Council and the community, will be seeking to actively involve these interests in the Portland Plan as it moves forward.

Thank you for your concern and I am confident the Planning bureau will take them seriously and into consideration as they move into the next phase of the Portland Plan.

Thank you,

Veronica A. Valenzuela
Office of Mayor Tom Potter
Liaison to Portland Bureau of Planning
1221 SW 4th Ave, Suite 340
Portland, Oregon 97204
503.823.4120 telephone
503.823.3588 fax

-----Original Message-----

From: mbart [mailto:mbart@pacifier.com]
Sent: Friday, September 28, 2007 9:45 AM
To: Valenzuela, Veronica
Subject: Re: planning/ mayors staff

Veronica,
Steve Dotterer passed along the time line for completing the Plan, but there were no dates provided for meetings as I requested. Thank you for helping me get this.

As I anticipated, much of the direction for BOP will be determined this next month with the development of the RFP and hiring of staff and consultants.

Subject: About the Portland Plan

From: "Dotterrer, Steve (Planning)" <sdotterrer@ci.portland.or.us>

Date: Thu, 27 Sep 2007 09:59:09 -0700

To: "mbart@pacifier.com" <mbart@pacifier.com>

CC: "Ames, Betsy" <bames@ci.portland.or.us>, "Valenzuela, Veronica" <vvalenzuela@ci.portland.or.us>

Attached are some information materials for the Portland Plan, which will provide an update of the city's Comprehensive Plan, the Central Portland Plan as well as other policy framework documents for the city. As you will see from the timeline and the description, over the next six months we will be drafting a work plan and public outreach approach for the Portland Plan. That workplan and outreach must be approved by the Planning Commission and City Council, and then submitted to the State Land Conservation and Development Commission for their approval. After its approval, we can begin the formal planning process (including appointing any subcommittees or advisory groups).

In your request, you ask about being involved in revisions to the Planning and Zoning Code. The Portland Plan's policy conclusions will almost certainly require some modifications to the Zoning Code and it is possible that Plan may result in some larger reorganization of the code, that is not a foregone conclusion. A major rewrite or revamping of the zoning code would come after the Portland Plan's conclusions in 2010.

I hope that this information helps. At this time, Bureau staff has been working with the Planning District Liaison's for each district of the city and briefing the boards of the District Coalitions about the Portland Plan proposal and getting their reactions and advice. I would encourage you to get involved with your coalition.

<<ThePortlandPlanv5.doc>> <<timeline and coordination portland plan v5.doc>>

Please let me know if you have additional questions about the Portland Plan,

Steve Dotterrer
Principal Planner,
Bureau of Planning
503-823-7731

ThePortlandPlanv5.doc Content-Type: application/msword
Content-Encoding: base64

timeline and coordination portland plan v5.doc Content-Type: application/msword
Content-Encoding: base64

Subject: Portland Plan, visionPDX and all things Planning

From: "Stephens, Stephanie" <Stephanie.Stephens@ci.portland.or.us>

Date: Tue, 9 Oct 2007 15:07:45 -0700

To: "mbart@pacifier.com" <mbart@pacifier.com>

CC: "Dotterrer, Steve (Planning)" <sdotterrer@ci.portland.or.us>, "Valenzuela, Veronica" <vvalenzuela@ci.portland.or.us>

Hello Mark,

This is Stephanie Stephens, Project Manager with visionPDX. I have been recently updated by Steve Dotterrer and Veronica Valenzuela about your interest in the Portland Plan. As you likely know, we are truly in the very beginning stages of conceptualizing this project. I'm happy to hear of your interest and we will continue to keep you and others informed as the concept moves forward.

In addition to conceptualizing the Portland Plan, the bureau is also moving visionPDX into the action phase of the project. Currently, we are assembling a Transition Team of community members who have been involved in visionPDX to help us think through the charge for the Vision into Action Coalition, how best to involve community members and groups, and how visionPDX might interface with the Portland Plan. The Vision into Action Coalition will be launched in January. I am more than happy to include you in this endeavor (either the Transition Team or the Coalition), should you have the interest.

The Bureau of Planning is currently in the middle of a physical move of our office to the 7th floor of 1900 SW 4th. As you can imagine, things are quite messy at the moment. I'm writing to see if Steve and I can set up a meeting with you sometime after our move is completed - perhaps sometime between October 22 and 31st. We would love to talk with you in person about the Portland Plan.

Let me know when you have time to meet (after October 22) and whether you have interest in our visionPDX work.

Thanks and talk with you soon,

Stephanie

Stephanie D. Stephens

Program Manager, visionPDX

c/o Bureau of Planning

1900 SW 4th Avenue, Suite 4100

Portland, Oregon 97201

503-823-9588

stephanie.stephens@ci.portland.or.us

Subject: Mark Bartlett on the Public Engagement List
From: "Stephens, Stephanie" <Stephanie.Stephens@ci.portland.or.us>
Date: Thu, 28 Feb 2008 09:25:29 -0800
To: "Appleberry, Christine" <Christine.Appleberry@ci.portland.or.us>
CC: "mbart@pacifier.com" <mbart@pacifier.com>

Hi Christine,

Can you please make sure that Mark is on your PE list for the Portland Plan? Also, can you send him the info for today?

Stephanie

Stephanie D. Stephens
Program Manager, visionPDX
Portland Planning Bureau
1900 S.W. Fourth Avenue, Suite 7100
Portland, Oregon 97201-5380
503-823-9588
stephanie.stephens@ci.portland.or.us

Portland's Vision for 2030:

Shaped by the Willamette and Columbia rivers, Portland connects people and nature to create an international model of equity and sustainability. We are a city of communities. Our distinct neighborhoods and vibrant downtown are safe, energizing civic and cultural spaces. Our diverse population, innovative businesses and forward-thinking leaders work together to ensure livability for all.

Information from ESET Smart Security, version of virus signature database 2909 (20080228)

The message was checked by ESET Smart Security.

<http://www.eset.com>

In spite of my numerous letters and phone calls, I was not added to the distribution list until March 08

Subject: new meeting dates

From: Mark Bartlett <mbart@pacifier.com>

Date: Tue, 18 Mar 2008 13:54:20 -0700

To: "Dotterrer, Steve (Planning)" <sdotterrer@ci.portland.or.us>, "Appleberry, Christine" <Christine.Appleberry@ci.portland.or.us>, "Valenzuela, Veronica" <vvalenzuela@ci.portland.or.us>

Steve and or Christine,
Thought I'd let you know there is confusion about the postponement of the assessment report hearing.

The memo says March 25, now postponed to 4-22 ???

and then a Planning Commission hearing on that subject, which is scheduled for 08 April.

Would it not be useful for this meeting and discussion to occur after the public part, so that concerns could be aired in front of the Planning Commission meeting?.

Now if postponed as I understand, the public portion occurs after the Planning Commission meeting.

How does that serve the interested public?

Please clarify and distribute to the list, and update the site online.

An additional concern I had was what if CIAC does not allow for the substitution?

and what if they do not allow for an extension?

What are the contingency plans, and should they not be made public in the event they are not granted?

I still cannot understand how we can form a citizens committee to design light details for the as yet not approved, not funded, CRC bridge, but we cannot allow one for the most important work we will face for this next generation.

I also find it ironic that we are entrusting the Bureau of Planning to fashion a vision and then a plan for our city going forward for 30 years, while they fail to create a public involvement process in time for a review they knew was coming.

How do you explain this?

Mark Bartlett

Jonah Paisner
Chair, STNA Public Land Committee
president@southtabor.org

Mark Bartlett
Chair, MTNA Public Land Committee
mbart@pacifier.com

October 29, 2007

Mayor Tom Potter
Office of the Mayor
1221 SW Fourth Ave, Suite 340
Portland, OR 97204

City Council Members
City Hall
1221 SW Fourth Ave
Portland, OR 97204

Re: Introduction and Request for Public Involvement Re: Public Land

Dear Mayor Potter and City Council Members:

We are the Public Land representatives of the neighborhoods adjacent to Mt. Tabor in Southeast Portland. Over the past months we have expressed specific interest in being involved in the City of Portland's (COP) review of, and development of, the update for the Comprehensive Plan.

The City is required to produce a Comprehensive Plan for the State of Oregon's Periodic Review by the Department of Land Conservation and Development (DLCD). Prior to the Plan's review by the DLCD, it will need to have City Council's authorization.

We can see from information recently made available by the Bureau of Planning (BOP) that it is presently engaged in phase one (ORS 197.629) of the periodic review process, but has yet to inform or involve citizens. This activity appears not to be in compliance with OAR 660-015-0000 Goal 1.

Although there are discrepancies in the timelines provided by BOP to the neighborhood coalitions and to us, consistency exists in regards to the lack of public notification and engagement. Bureaus tend to construct a plan, choose participants, frame the process through a work plan and internal meetings, and then allow the public to choose from the resulting conclusions, A or B. This is not true citizen involvement.

A genuine process would involve participation at the front end, as framing the plan directly influences the outcome. The comprehensive plan review and development must be consistent with the Statewide Planning Goals. The state's Land Conservation and Development Commission (LCDC) reviews work plans for such consistency. When LCDC officially approves a local government's plan, the plan is said to be 'acknowledged'. It then becomes the controlling document for land use in the area covered by that plan.

The State of Oregon's Statewide Planning Goals and Guidelines make it clear that public involvement is required in land use planning. We are requesting that the City, and State, follow the State of Oregon's Statewide Planning Goals and Guidelines (ORS 197.250).

Oregon's Statewide Planning Goals, Goal 1: Citizen Involvement OAR 660-015-0000(1) calls for community participation and transparency in all phases of planning:

The citizen involvement program shall involve a cross-section of affected citizens in all phases of the planning process. As a component, the program for citizen involvement shall include an officially recognized committee for citizen involvement (CCI) broadly representative of geographic areas and interests related to land use and land-use decisions. Committee members shall be selected by an open, well-publicized public process.

Further, Goal 2 states: "Opportunities shall be provided for review and comment by citizens and affected governmental units during preparation, review and revision of plans and implementation of ordinances." The bureaus have been meeting, but once again, where is the public access or notification? We are not aware of any to date.

While Oregon's Statewide Planning Goals clearly provide citizen access to the process, State statutes also hold citizens responsible for being involved early in the process in order to challenge plans and regulations at the state level. ORS 197.253 requires "participation, either orally or in writing, in local proceedings in order for a person to submit written comments and objections to the State's Land Conservation and Development Commission (LCDC) in regards to the adoption of plans and regulations by the local jurisdiction." Therefore, it is imperative that the City, and the State, follow Planning Goal 1 and provide widespread citizen involvement.

The City of Portland is presently engaged in an extensive dialog regarding citizen engagement through endeavors such as the Bureau of Innovation Projects (BIP) and Vision PDX. Planning Goal 1 provides an excellent blueprint for the type of citizen involvement the City appears to be pursuing. We recommend that Planning Goal 1 and BIP #9 be used as a guide for these important City processes.

We are also aware that the City's Parks Bureau is engaged in a public process regarding the use and future plans for the Mt. Tabor Maintenance Yard. This letter and our efforts are in concert with those efforts. However, this letter concerns a separate and more overarching initiative. We are responsible for ensuring that citizens are informed and can actively participate in all decisions, which affect any of our public land, regardless of which government body, division, or bureau is charged with safeguarding that land.

In regards to the Periodic Review and Comprehensive Plan update, could you please respond to the following requests:

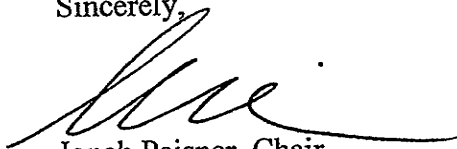
1. Provide a written response from the City of Portland in regards to the specifics about how Goal 1: Citizen Involvement OAR 660-015-000(1) will be addressed for the Comprehensive Plan so that our constituents (totaling some 15,000 people) can expect to have their voices heard in current and future decision-making that relates to land use decisions. If there is an existing public involvement plan BOP intends to use, please provide that;

2. Add our contact information to any and all distribution lists related to the Periodic Review or update of the Comprehensive Plan;
3. Provide us with meeting times and locations for all work for the periodic review, both phase one and phase two as outlined in ORS 197.629; and
4. Send us a copy of the State's letter of request for Periodic Review and the City of Portland's letter of response.

We understand that public land planning and laws are complicated. We also understand that land related decisions, and especially zoning changes, are fundamental to every other aspect of present and future life in our city and state. It is essential that all jurisdictions live up to their commitment, and their award winning reputation, for outstanding public involvement and land use planning.

Thank you for your time and consideration.

Sincerely,



Jonah Paisner, Chair
South Tabor Public Land Committee



Mark Bartlett, Chair
Mt. Tabor Public Land Committee

cc: City Commissioner Sam Adams
City Commissioner Randy Leonard
City Commissioner Dan Saltzman
City Commissioner Eric Sten
Planning Bureau Director Gil Kelly
Land Conservation and Development Commission

Tabor Public Land Task Force

c/o South Tabor Neighborhood Association 3534 SE 52nd Avenue #124 Portland, OR 97206
Telephone 503-922-1905 Fax 503-777-3373

Jonah Paisner

Chair, South Tabor Neighborhood Association
Public Land Committee
president@southtabor.org

Mark Bartlett

Chair, Mount Tabor Neighborhood Association
Public Land Committee
mbart@pacifier.com

December 5, 2007

Mayor Tom Potter
Office of the Mayor
1221 SW Fourth Ave, Suite 340
Portland, OR 97204

David Bragdon
Metro Council President
600 NE Grand Ave.
Portland, Or 97232-2736

Re: Nonresponse to 10/29/07 Letter Re: Public Land/ Periodic Review

December 5, 2007

Dear Mayor Potter, Metro President David Bragdon, and other interested parties:

We continue to be concerned that the City of Portland's Bureau of Planning (BOP) is proceeding to conduct its "periodic review" evaluation without informing or involving the public in this discussion.

We are disappointed that our letter dated October 29, 2007 to the Mayor and Counsel, among others, was ignored. That letter is attached. We renew our requests in that earlier letter, and express additional concerns in this letter. We represent real concerned citizens, and are entitled to the courtesy of a response from our elected officials.

We have reviewed the DLCD request for Periodic Review letter to the City of Portland, dated November 13, 2007. In that letter, the DLCD states in simplistic terms the steps for conducting this review. It is troubling, as well as not in conformance with the statewide planning Goal 1, that the BOP has begun conducting its evaluation of "their comprehensive plans and land use regulations to determine what, if any, changes are needed", without citizen involvement.

Goal 1 clearly states that the "citizen involvement program **shall** involve a cross section of affected citizens **in all phases** of the planning process." (Emphasis added).

By "all phases", we assert that this starts with the initial evaluation "to determine what, if any, changes are needed." If the BOP conducts this part of the review process without citizen participation, then at what point would they involve the public to conform with Goal 1?

By the time this evaluation is complete and all the technical internal decisions are made, the public would have been completely shut out of the real decision-making process. The citizens would be left to choose from whatever alternatives that the BOP decides to offer. This is not "public involvement" in keeping with the Goals of the DLCD.

Goal 1 also calls for a citizen involvement program with an officially recognized committee selected by an open and transparent process. This group must be representative and broadly based.

Goal 1 directs that the BOP may request to substitute a planning commission instead of an independent citizen involvement committee, but we are skeptical such an arrangement would be:

- Open and transparent;
- Broadly based and representative of a cross section of affected citizens; and
- Composed of members who are selected in an open and transparent process.

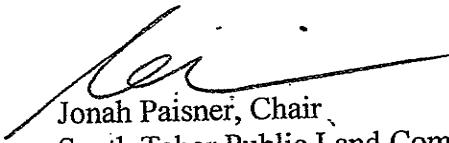
Given this structure, it is distressing that the planning commission already exists and does not appear to have been set up in an open and transparent way.

The BOP has been working for a few months on this evaluation, and at no time has it offered the public an opportunity to participate, much less informed us that this evaluation is underway. In fact our requests to observe and participate in the evaluation have been rejected by BOP staff.

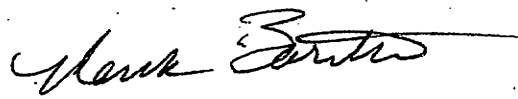
Please inform us how the City of Portland and Metro intend to bring this discussion to the public, what form of public involvement will be used, and how the process will comply with Goal 1.

We think that the City of Portland can do better in engaging the public and offering a real process. Unless we hear from you, we are left to assume this process consists of the Bureau of Planning coming up with so called "choices" which really are the product of back room deals. Your response can confirm that this City and Region are willing to be open and transparent about what matters most: our land.

Sincerely,



Jonah Paisner, Chair
South Tabor Public Land Committee



Mark Bartlett, Chair
Mt. Tabor Public Land Committee

Enclosure

cc: City Commissioner Sam Adams
City Commissioner Randy Leonard
City Commissioner Dan Saltzman
City Commissioner Eric Sten
Portland Planning Bureau Director Gil Kelly
Land Conservation and Development Commission
Cliff Violiva and Larry French, DLCD



Office of Mayor Tom Potter
City of Portland

January 9, 2008

Mark Bartlett, Chair
Mount Tabor Neighborhood Association
Public Land Committee

Jonah Paisner, Chair
South Tabor Neighborhood Association
Public Land Committee

Tabor Public Land Task Force
c/o South Tabor Neighborhood Association
3534 SE 52nd Avenue, #124
Portland, Oregon 97206

Dear Misters Paisner and Bartlett:

Thank you very much for your letter asking for strong public engagement in the update of the City of Portland's Comprehensive Plan under the Periodic Review requirements of the State of Oregon. I agree with you that public involvement is essential to a successful update of the Comprehensive Plan and have confirmed with the Planning Bureau that will be the case.

As you mention in your letter, I instituted Bureau Innovation Projects # 8 and 9 to improve public involvement within the City. I also initiated the visionPDX project which the City Council recently adopted. Both of these initiatives used groundbreaking approaches to outreach and involvement so that Portlanders who are often under-represented in public processes could be fully involved in the future of their city. The Planning Bureau will be taking lessons learned from these processes into the Portland Plan project and the update of the Comprehensive Plan.

I want to be sure that you understand the Planning Bureau will be taking a very broad look with the Portland Plan. This effort will include the requirements for state-mandated Periodic Review of the city's Comprehensive Plan and the Central City Plan. In addition to that critical update, the Portland Plan will include:

1. The integration of the values and issues that Portlanders identified through visionPDX into the city's comprehensive planning.
2. The coordination and integration of the long-range plans of the Planning bureau with the long-range plans of other city bureaus. Our intent is that the City has a coordinated and strategic approach to its future development when the Portland Plan is completed.
3. A public outreach and involvement element that meets the state's requirements and carries out the draft recommendations of Bureau Innovation Project #9 and continues the involvement of previously overlooked Portlanders that was such an important element of visionPDX.

I am aware that this is a large assignment that goes well beyond the topics of land use that you cite in your letter and that are covered under the requirements of LCDC goals and administrative rules. In order to fulfill these directives, the Planning Bureau and the other bureaus involved in planning our city need to work together to coordinate their planning activities, something which Portlanders have asked for but which has not happened for many years. In addition, this larger scope of work will need to be coordinated with Metro and state planning activities (sometimes called the New Look and the Big Look), efforts which are still evolving themselves. As a result, I expect that the Planning bureau staff will carefully consult with these other bureaus and agencies so that they can make the most effective use of their own work, various communities' input, the time of the Council and other city boards and commissions. And in particular, I want them to have a clear and simple way for the public to be directly and effectively involved in the Portland Plan. I want to be sure that the work of these bureaus is well thought out and coordinated. This effort will take some time for city staff, but I can assure you that no decisions have been made on either the issues to be addressed or the process for public involvement at this time. No final decisions will be made until the Council adopts the workplan for submittal to the state LCDC in the spring of this year.

You note in your letter that the city is required to have an officially recognized Citizens Involvement Committee for an update effort such as we are about to undertake. The initial recommendation of the Planning bureau, which I have agreed to, is that the Portland Planning Commission is the appropriate body for this assignment. A planning commission serving as a citizen involvement committee must have members "chosen through an open, well publicized public process." The City of Portland's Planning Commission is chosen in this way. The Planning Commission is a broad based citizen commission that brings a variety of perspectives and experience to their positions. The application process for the planning commission is an open process and we've had dozens of people express their interest in serving. I take my role in recommending candidates for appointment very seriously. Each appointment is done through the Council and the Commission meetings themselves are open to the public and televised on Channel 30. It's a thoughtful and balanced group of individuals. I fully trust them to represent the community in making sound recommendations to the City Council about the Portland Plan and other projects and programs. The City Council this week approved my three most recent recommendations (Andre Baugh, Irma Valdez, and Howard Shapiro) who will add their breadth of experience and knowledge to the Commission.

Finally, I want to be sure that I respond to the specific requests that you have made in your letter:

1. **“Provide a written response in regards to the specifics about how Goal 1: Citizen Involvement OAR 660-015-000(1) will be addressed for the Comprehensive Plan...”** The Council has recently (through the fall 2007 BMP process) provided an additional staff person to the bureau whose sole focus will be outreach and involvement coordination. It is my understanding that person begins work on January 10th. Her name is Christine Appleberry. Once she begins work, I encourage you to contact her. She will be working with the Portland Plan team to develop the draft engagement plan for the project in consultation with the community (see below).

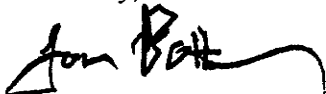
2. **“Add our contact information to any and all distribution lists related to the Periodic Review or update of the Comprehensive Plan.”** I have directed the Planning Bureau to do this and it is my understanding that they have done as you requested.

3. **“Provide us with meeting times and locations for all work for the periodic review, both phase one and phase two as outlined in ORS 197.629.”** As mentioned above, the Bureau is preparing the workplan and outreach effort. The initial focus of this effort will be meetings with the various neighborhood coalitions in late January and February. I encourage you to participate in the meeting the Bureau will have with Southeast Uplift. As required by the LCDC rules for Periodic Review, there will be at least two planning commission hearings, one on the evaluation of the adequacy of our current Comprehensive Plan and one on the draft work program for the update. These will be followed by a Council Hearing and action. All of these will be noticed meetings.

4. **“Send us a copy of the State’s letter of request for Periodic Review and the City of Portland’s letter of response.”** Please find attached a copy of the state’s letter. As you will note, the city’s response is not due until May of this year, and we have not yet begun to draft the letter of response. We do not expect to do so until most of the public involvement and outreach and the state required assessment of our current Comprehensive Plan have been completed. This will give you and other Portlanders an opportunity to review our proposed response to the state. If you want to know more about our Periodic Review and/or discuss some of the ORS and administrative review issues which you have raised in your letter, I encourage you to talk with Al Burns in the Planning Bureau, who is the city’s Periodic Review specialist and liaison to the State of Oregon.

Again, thanks for your letter on the importance of public involvement in the Portland Plan. I agree completely with your objectives and will continue to make every effort to involve all Portlanders in the future of their city.

Sincerely,



Tom Potter
Mayor

TP:vv

cc: President Bragdon, METRO

Subject: image.cfm (application/pdf Object)

From: Mark Bartlett <mbart@pacifier.com>

Date: Mon, 10 Mar 2008 13:09:29 -0700

To: dennis <DDerby@aol.com>, Pat Wheeler <pwheeler@coas.oregonstate.edu>, Paul Leistner <paulamy@teleport.com>, Jonah Paisner <jonah@paisnerlaw.com>

<http://www.portlandonline.com/shared/cfm/image.cfm?id=187875>

Dennis,

Here is Gil's memo to bring this before council for approval this Wed. If done in this fashion, Wed may be the only opportunity for public comment on the process before council. Once it passes this step, it goes to a second hearing, but no further public testimony must be allowed. (my understanding of council procedure)

Once again, this is not a well publicized action, and they can avoid genuine engagement by presenting in this fashion to council.

How many citizens can take off work to go to testify at 2 pm on a Wed?

All of the issues I anticipated and brought to you are laid bare here in pages 1-5.

- 1) they had no public involvement process to evaluate, as the very first step in the response.
- 2) they formed tech work groups long ago to conduct the evaluation without any public access or participation.
- 3) they plan to construct recommendations along with the work plan and then bring these to the public in April, for comment.
- 4) they intend to bring many projects and initiatives forward under the comprehensive Portland Plan for ratification, some of which the public will not see until that time they are incorporated.
- 5) they plan public outreach not true engagement, and after they have constructed their recommendations not in collaboration with the public. (ie choice A or Aa)
- 6) they plan to have a draft engagement strategy in April, once again long after the policy and tech work is completed without any public participation or oversight.

It would seem every single issue I had with the way they were going about this process was identified and substantiated within this memo.

Planning still refuses to acknowledge that this is not a public process. They are attempting to dress up any true input as outreach so that citizens to do not have any real constructive means to participate in this most important process.

Planning still has not, and appears reluctant to even post notes from those meetings on their web site, so we will never know now just what the discussions were.

I am unclear how I can further formalize my concerns so that action can be taken by the LCDC to compel them to correct this.

Even then I don't know that recommendations already baked in to the cake can be altered. It has come to pass just as I anticipated thus far.

I'd appreciate hearing from you on this.

Thank you,

Mark