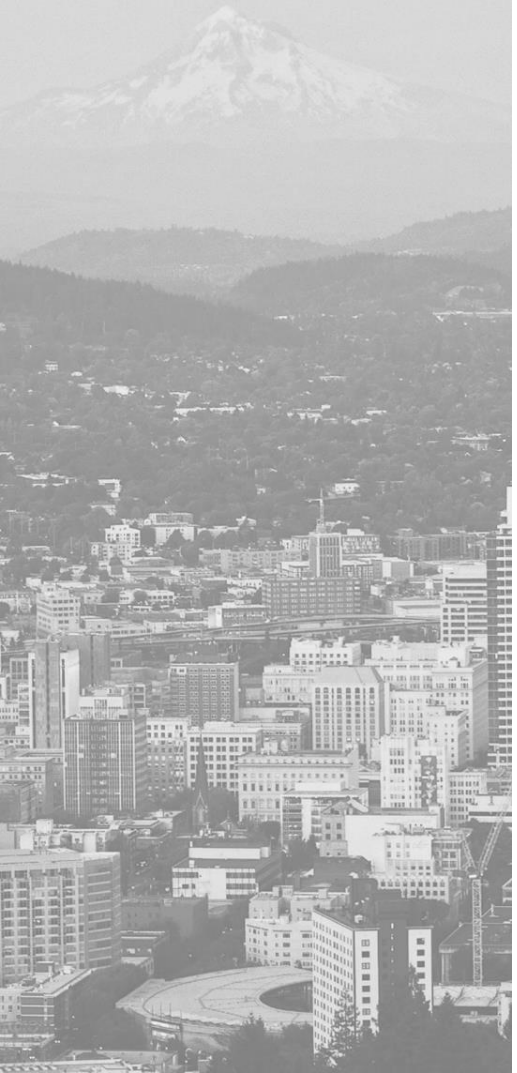
CHARTER COMMISSION

Bureau & Office Proposals Subcommission

September 27, 2022



Agenda

Section	Time
Welcome & subcommission business	10 min
Small Donor Elections Program proposed amendments	25 min
Auditor's proposed technical amendments	25 min
Redline from City Attorney's Office • **Proposed amendments advanced by full Commission** • **Proposed amendments to address BDS/OEHR proposals**	20 min
Timeline & approach moving forward	20 min
Closing & next steps	10 min

Small Donors Program Proposal

PORTLAND ELECTIONS COMMISSION AND SMALL DONOR ELECTIONS INDEPENDENCE
CHARTER AMENDMENT PROPOSED LANGUAGE

ARTICLE 2. INDEPENDENT PORTLAND ELECTIONS COMMISSION.

Section 3-201. Independent Portland Elections Commission.

The Independent Portland Elections Commission is hereby authorized and established.

The Portland Elections Commission shall implement the City's public financing of elections program as adopted in City Code and in accordance with the vision and goals as set forward by the Council. The Portland Elections Commission may implement any other law or function related to elections, campaign finance, ethics, or other related subjects if delegated to it with appropriate resources.

The Portland Elections Commission consists of nine (9) residents of the City who collectively represent the diversity of the City. Members of the public may apply to become a Portland Elections Commissioner. To fill vacancies, the Portland Elections Commission recommends candidates for Mayoral appointment and Council confirmation. The members may be removed prior to the completion of their term according to Charter Section 2-602 or by the Portland Elections Commission in a process outlined in its bylaws.

Cont.

PORTLAND ELECTIONS COMMISSION AND SMALL DONOR ELECTIONS INDEPENDENCE
CHARTER AMENDMENT PROPOSED LANGUAGE CONT.

ARTICLE 2. INDEPENDENT PORTLAND ELECTIONS COMMISSION.
Section 3-201. Independent Portland Elections Commission.

The Commission may require bureaus and departments of the City to provide technical assistance.

The Commission shall annually notify the Mayor and Council of the amount of funding required to ensure the solvency of the public financing program and other programs and duties carried out by the Commission. The Commission has a budget as provided by the City Council.

PORTLAND ELECTIONS COMMISSION AND SMALL DONOR ELECTIONS INDEPENDENCE
CHARTER AMENDMENT PROPOSED LANGUAGE CONT.

California exclusions:
(2) The State Auditor shall remove from the applicant pool individuals with conflicts of interest including:
(v) Served as paid congressional, legislative, or State Board of Equalization staff.
(vi) Contributed two thousand dollars ($2,000) or more to any congressional, state, or local candidate for elective public office in any year, which shall be adjusted every 10 years by the cumulative change in the California Consumer Price Index, or its successor.
(B) Staff and consultants to, persons under a contract with, and any person with an immediate family relationship with the Governor, a Member of the Legislature, a Member of Congress, or a member of the State Board of Equalization, are not eligible to serve as commission members. As used in this subdivision, a member of a person's "immediate family" is one with whom the person has a bona fide relationship established through blood or legal relation, including parents, children, siblings, and in-laws.

PORTLAND ELECTIONS COMMISSION AND SMALL DONOR ELECTIONS INDEPENDENCE
CHARTER AMENDMENT PROPOSED LANGUAGE CONT.

Colorado:
(c) No person may be appointed to or serve on the commission if he or she:
(I) Is or has been a candidate for federal elective office within the last five years preceding the date on which applications for appointment to the commission are due under subsection (4) of this section; (II) Is or has been, within the last three years preceding the date on which applications for appointment to the commission are due under subsection (4) of this section,
(IV) Is or has been, within the last three years preceding the date on which applications for appointment to the commission are due under subsection (4) of this section, an elected political party official above the precinct level in Colorado or an employee of a political party;
(V) Is a member of the commission responsible for dividing the state into senatorial and representative districts of the general assembly; or
(VI) Is or has been a professional lobbyist registered to lobby with the state of Colorado, with any municipality in Colorado, or at the federal level within the last three years preceding the date on which applications for appointment to the commission are due under subsection (4) of this section.

Auditor’s Office
Technical Proposals

Auditor's Technical Proposals

Bureau	Proposed Charter Amendment(s)
Auditor	Delete the term "facsimile signature" because the term is outdated. Delete the requirement that bonds bear the signature of the Auditor and Mayor because the Auditor isn't involved in bond processes and the level of detail isn't necessary. Charter Sections 7-203 and 15-106.
Auditor	Clarify damage and fair-and-moral claims. Section 1-107 is outdated and confusing. Merge 1-106 and 1-107 to maintain the values behind them and to allow the Council to direct the payment of claims when it is undisputed that the City caused the injury. Charter Sections 1-106 and 1-107.

Source: https://www.portland.gov/sites/default/files/2022/8.22-auditor-updated-charter-amendments-1.pdf

Auditor's Technical Proposals

Bureau	Proposed Charter Amendment(s)
Auditor	Eliminate and modernize outdated Auditor duties • Delete 2-508(d) – the duty to make the final determination of acceptability and legitimacy of all claims for payment made against the City and 2-508(e) – the discretion to review transactions before they are paid. The Bureau of Revenue & Financial Services performs these functions. • 2-507(a)(4) requires the Auditor to provide official certifications "as required by this Charter." The Charter includes only limited requirements for Auditor certification. Propose requiring the Auditor to provide certifications "as needed for the conduct of City business." • 2-508(f) gives the Auditor access to City information to conduct auditors. Propose moving this provision to 2-507. Also delete reference to 2-509 (Ombudsman) from 2-507(a)(5) because the Auditor's Office investigates in other capacities. Charter Sections 2-507 and 2-508

Source: https://www.portland.gov/sites/default/files/2022/8.22-auditor-updated-charter-amendments-1.pdf

Auditor's Technical Proposals

Bureau	Proposed Charter Amendment(s)
Auditor	Instead of requiring the Auditor's signature on "all warrants, contracts, bonds, and other official documents," revise 2-513(b) to require the Auditor's signature on an official document only "as needed." Or delete section altogether. Auditor's Office conferred with the City Attorney's Office and the City Treasurer in preparing these proposed amendments. Charter Section 2-513.
Auditor	Adding "or Charter" after "authorized by Council" to reflect the Auditor's independent contracting authority that was not updated in the 2017 Charter amendment. The Auditor has independent authority to enter into contracts without additional Council approval. Charter Section 8-104.
Auditor	Eliminate Auditor's role in Bureau of Transportation administrative processes. Replace reference to the Auditor with reference to the appropriate office or official – or, where appropriate, with "the City official designated by ordinance." Additional amendments are proposed to reflect current notice periods. Delete provisions that aren't appropriate for Charter, so they can be added to City Code. Charter Sections 2-105 and Charter Chapter 9.
Auditor	Modernize changing "council" to keep a journal of proceedings to "Auditor" for consistency with the Auditor's Office managing council records. Charter Section 2-510. "Journal" and "summary" are outdated terms. Charter Section 2-112.

Source: www.portland.gov/sites/default/files/2021/all-bureau-proposed-amendments.pdf

Redlines from City Attorney’s Office

DRAFT LANGUAGE FROM CITY ATTORNEY

#	Bureau	Proposed Amendment(s)	Commission Decision
1	OMF	Currently tort damage settlements by the City exceeding $5,000 need to be approved by ordinance passed by Council, and the Bureau has authority to settle claims for up to $5,000. Increase this threshold to $25,000. (Only if phase I is not approved by voters).	Advanced to City Attorney's Office for drafting
Draft Language from Attorney		**Section 1-106. Damage Claims, Insurance.** Notice of and claims for damages arising out of the alleged torts of the City and those of its officers, employees and agents acting within the scope of their employment or duties, must be presented within the time prescribed by law. The Council shall establish a Loss Reserve Fund and shall annually budget an amount sufficient to maintain such Fund on an actuarially sound basis. The monies in such Fund may be invested and reinvested in the like manner with other City funds and the earnings from such investment and reinvestment shall be credited to the Fund. Payments may be made from the Loss Reserve Fund to pay claims against the City, its officers, employees and agents, procure insurance against such liability, and pay costs related to the payment of claims including but not limited to payment of investigative, legal and administrative expenses. In the event the ~~Council~~ Mayor shall deem it advantageous to procure insurance against claims, the existence of insurance shall be considered in determining the funding necessary to maintain the Loss Reserve Fund on an actuarially sound basis. The ~~Commissioner In Charge~~ Mayor may negotiate, compromise and settle any claims and may authorize the payment of any claim in an amount not to exceed ~~five~~ ~~fifty~~ twenty-five thousand dollars ($~~50~~25,000). Payment exceeding ~~five~~ ~~fifty~~ twenty-five thousand dollars ($~~50~~25,000) for any claim must be authorized by an ordinance.	

DRAFT LANGUAGE FROM CITY ATTORNEY

#	Bureau	Proposed Amendment(s)	Commission Decision
3	OMF	Charter limits the transient lodging tax that may be imposed by the Council to 5%. Remove this limitation. § 7-113	Advanced to City Attorney's Office for amendment drafting
Draft Language from Attorney		**Section 7-113. Transient Lodgings Tax. 1.** The Council may by ordinance impose and levy a tax ~~not exceeding five percent~~ on gross amounts of money, credit or other things of value paid to or received for lodging by the owner or operator of any hotel, motel, apartment or lodging house, mobile home or trailer park or court, or any other place in the City where space designed or intended for lodging occupancy is rented by any person or persons, for any period less than monthly. This tax shall not apply to hospitals, convalescent or nursing homes, or public institutions, or permanent occupancy as defined by ordinance. Minimum rentals to which the tax shall apply may be fixed by ordinance. The tax imposed shall be collected by the owner or operator of the rental space in addition to the rental charge, at the time of payment of rent. City revenues from such taxes shall be credited to the General Fund of the City and used for general City purposes, as the Council may find appropriate, which may include provision for and the acquisition, construction, operation and maintenance of recreational, cultural, convention or tourist-related facilities or services.	

DRAFT LANGUAGE FROM CITY ATTORNEY

#	Bureau	Proposed Amendment(s)	Commission Decision
4	OCT	Sections of the Charter regarding the granting of franchises for public utilities, such as railways, pipelines, telecommunications, and electricity and methane transmission are from 1942. Remove these outdated, detailed, burdensome and redundant requirements for franchise agreements. §§ 10-205, 10-207, 10-208, 10-212, 10-213	Advanced to City Attorney's Office for amendment drafting
Draft Language from Attorney		**Section 10-205. Limited Time.** Franchises may be granted for a limited time in, ~~and~~ upon, under and above the streets, highways and public places and property of the City of Portland, in the manner and subject to the conditions hereinafter contained.	

DRAFT LANGUAGE FROM CITY ATTORNEY

4 Cont'd	
Draft Language from Attorney	**Section 10-207. Method of Granting.** Every franchise shall be embodied in an ordinance, which shall contain all the terms and conditions of the proposed grant~~, and shall be filed with the Auditor. Thereupon such proposed ordinance shall be published in full, once in the City official newspaper. There shall also be published, in a conspicuous place in such daily newspaper of the City having a circulation in excess of fifteen thousand (15,000), as the Council may direct, a notice prepared by the Auditor, that an application has been made for a franchise, giving the name of the applicant, the character and location of the proposed grant, and requesting any person having any objections to such proposed franchise or any provisions thereof to file the same in writing with the Auditor within twenty (20) days from the first publication of such notice. If the request is made therefor, the Council shall fix a time for a hearing upon such objections and give reasonable notice of the time thereof and not less than five (5) days. All of such publications and notices shall be at the expense of the applicants for such franchises.~~ ~~Such ordinances shall not come up for first reading until after the expiration of the said twenty (20) days. If such ordinance shall be amended, it shall be republished in the City official newspaper in full as amended. No such ordinance granting a franchise shall be put on final passage within thirty (30) days after the first reading nor within twenty (20) days after any amendment thereto, and the affirmative vote of four (4) Commissioners nine (9) Councilors shall be required to pass the same.~~

DRAFT LANGUAGE FROM CITY ATTORNEY

4 Cont'd	Sections of the Charter regarding the granting of franchises for public utilities, such as railways, pipelines, telecommunications, and electricity and methane transmission are from 1942. Remove these outdated, detailed, burdensome and redundant requirements for franchise agreements. §§ 10-205, 10-207, 10-208, 10-212, 10-213
Draft Language from Attorney	~~**Section 10-208. Effective Date.** No franchise shall take effect until sixty (60) days after its passage unless it shall receive a majority of the votes cast thereon at a referendum election held for that purpose within a less time. The filing of a petition for referendum shall defer the taking effect of a franchise until after the election. A petition signed by two thousand (2,000) registered voters shall be sufficient to call a referendum upon any franchise ordinance.~~
	~~**Section 10-212. Written Acceptance.** Every grantee of any franchise, right or privilege shall within thirty (30) days after the ordinance granting the same shall be enforced, file with the City Auditor Recorder a written acceptance of the same, and a failure on the part of the grantee to file such written acceptance within the time specified shall be deemed an abandonment and rejection of the rights and privileges conferred, and the ordinance granting the same shall thereupon be null and void; such acceptance shall be unqualified and shall be construed to be an acceptance of all the terms, conditions and restrictions contained in the ordinance granting the same.~~

DRAFT LANGUAGE FROM CITY ATTORNEY

4 Cont'd	
Draft Language from Attorney	**Section 10-211~~3~~. Statements.** Within ninety (90) days after this Charter shall take effect, the holder of any franchise shall file with the Auditor a full and correct statement of the franchise, rights and privileges owned or claimed to be owned, and shall designate the same by the numbers and titles of the ordinances by which such franchises were granted, and any holder of any franchise, on failure so to do, shall be guilty of an offense punishable by a fine ~~of not less than ten dollars ($10) and not more than one hundred dollars ($100) per day while such refusal or neglect continue~~. The holder of every franchise, and the grantees of every franchise hereafter granted, on sale, transfer, mortgage or lease being made of such franchise, shall within sixty (60) days thereafter file with the Auditor a copy of the deed, agreement, mortgage, lease, or other written instrument evidencing such sale, transfer or lease, certified and sworn to as correct by the grantee, in person, if an individual, or by the president or secretary or authorized agent, if a corporation. Every sale, transfer, mortgage or lease of such franchise, whether voluntary or involuntary, shall be deemed void and of no effect unless the grantee shall, within sixty (60) days after the same shall have been made, file such certified copy as required by this Section and consented to as provided in Section 10-216 of this Charter, also unless the Council agrees to such sale by an ordinance expressly passed for that purpose, as provided by Section 10-216. ~~The Auditor shall file all such documents and shall make and keep an index of the same in a book to be kept by the Auditor for that purpose, which book shall be a part of the public records of the City.~~

DRAFT LANGUAGE FROM CITY ATTORNEY

#	Bureau	Proposed Amendment(s)	Commission Decision
5	BDS	One of the City's specific powers is to regulate "offensive" businesses. Remove this reference, because it is undefined and vague. § 2-105(a)(36)	Advanced to City Attorney's Office for amendment drafting
Draft Language from Attorney		**Chapter 2, Section 2-105 Continuation of Specific Powers** **36.** To regulate, restrain and to provide for the exclusion from the City, or any part thereof, of trades, occupations or businesses which ~~are offensive or~~ may ~~in the opinion of the Council~~ create or constitute a nuisance, and to regulate uses of land and structures within the City.	
6	BDS	One of the City's specific powers is to prohibit "roaming the streets at unseasonable hours." Remove this reference, because it is undefined and vague. § 2-105(a)(50)	Advanced to City Attorney's Office for amendment drafting
Draft Language From Attorney		**Chapter 2, Section 2-105 Continuation of Specific Powers** ~~**50.** To prohibit persons from roaming the streets at unseasonable hours.~~	

DRAFT LANGUAGE FROM CITY ATTORNEY

#	Bureau	Proposed Amendment(s)	Commission Decision
7	BES	Add as one of the City's specific powers, and amend the City's authority regarding its sewage disposal and purification system, to include, various specific actions related to the protection and management of water, sewage and stormwater. §§ 2-105(a) and 11-301	Advanced to City Attorney's Office for amendment drafting
Draft Language from Attorney		**Chapter 2, Section 2-105(a) Continuation of Specific Powers** **62.** To protect, restore, remediate or alter channels, riparian areas and floodplains of streams; improve waterfronts; protect, restore, expand, fill or grade lakes, ponds, wetlands and other waters, natural systems or constructed equivalents; increase or diminish the flow of waters over or into land, or in natural or artificial channels and purify those waters; perform other acts and things found necessary or appropriate for sewerage, drainage, purification and proper disposal thereof; and fix charges therefor. The Council may assess such charges as part of sewer, water and other charges.	

DRAFT LANGUAGE FROM CITY ATTORNEY

#	Bureau	Proposed Amendment(s)	Commission Decision
7 Cont'd		Add as one of the City's specific powers, and amend the City's authority regarding its sewage disposal and purification system, to include, various specific actions related to the protection and management of water, sewage and stormwater. §§ 2-105(a) and 11-301	Advanced to City Attorney's Office for amendment drafting
Draft Language from Attorney		**Section 11-301. Sewage Disposal or Purification System.** The ~~Council~~ City may protect, restore, construct, reconstruct, remediate, enlarge, alter, modify, equip, operate and maintain a sewage and stormwater disposal or ~~sewage~~ purification system within or without the corporate limits or both, including but not limited to: all methods of storm drainage, including the use of natural systems or constructed equivalents, intercepting sewers, diversion sewers, relieving or interconnection sewers, sewers to separate storm and sanitary sewage, pump or ejector stations and equipment, and plants for the treatment and disposal of sewage. For that purpose the City may acquire by any lawful means property, real or personal, interests in property, equipment, and related facilities and may make all expenditures which the ~~Council~~ City finds necessary or appropriate to carry out such purposes, either within or without the corporate limits. The City may sell or otherwise dispose of any or all by-products or salvage products from this operation. The City also may contract with any other person, public or private, to further purification of public waters or protection of the public health.	

DRAFT LANGUAGE FROM CITY ATTORNEY

#	Bureau	Proposed Amendment(s)	Commission Decision
8	PPR	Update language to reflect the city's and PPR's role in protecting, restoring, and enhancing natural systems and natural areas, and to mitigate against the public health, economic, and threats of climate change, biodiversity loss and invasive species. § 12-101	Advanced to City Attorney's Office for amendment drafting
Draft Language from Attorney		**Section 12-101. ~~Parks and Recreational Areas and Facilities.~~ General Authority.** The ~~Council~~ City may establish parks, playgrounds, forests, wetlands and human-built or natural recreation areas and facilities of all kinds, either inside or outside the City ("recreational and natural areas"). For that purpose, the ~~Council~~ City may acquire by purchase, condemnation, gift, grant, donation, exchange or otherwise, real and personal property and any interest therein~~;~~, and may rent or lease property of any kind for public use~~;~~. ~~and may construct, reconstruct, remodel, alter, repair, maintain, improve and equip areas and facilities which the Council City finds necessary, appropriate or desirable, either inside or outside the City.~~ The ~~Council~~ City may exchange any property for other property which it deems more suitable or convenient for the use or protection of recreational and natural areas ~~park and recreation use~~, and the City may dispose of ~~the~~ property not needed for those purposes. The City may construct, reconstruct, remodel, alter, repair, preserve, ...	

DRAFT LANGUAGE FROM CITY ATTORNEY

#	Bureau	Proposed Amendment(s)	Commission Decision
8 Cont'd		Update language to reflect the city's and PPR's role in protecting, restoring, and enhancing natural systems and natural areas, and to mitigate against the public health, economic, and threats of climate change, biodiversity loss and invasive species. § 12-101	Advanced to City Attorney's Office for amendment drafting
Draft Language from Attorney		...restore, maintain, improve and equip recreational and natural areas. The ~~Council~~ City may establish, alter or discontinue programs, services and exhibits ~~and conduct programs~~ for the education or enjoyment of the public or for the protection of recreational and natural areas. ~~the furtherance of public enjoyment and recreation, and may change, alter or discontinue them. The Council City may construct, reconstruct, alter, remodel, furnish and equip improvements found necessary or appropriate for the convenience of the public using park and recreation facilities, or of persons or employees conducting or assisting park or recreational programs or maintaining parks, areas, facilities, or improvements.~~ The ~~Council~~ Mayor may contract with any public or private person in any matter relating to programs, services or exhibits ~~programs~~. The ~~Council~~ City may do all things ~~it~~ the City finds necessary or convenient to promote recreational and natural areas. ~~facilities and aesthetic enjoyment of the people, and the beautification of City property.~~	

DRAFT LANGUAGE FROM CITY ATTORNEY

#	Bureau	Proposed Amendment(s)	Commission Decision
9	BPS	The Charter currently prohibits the City from mandating weatherization of structures built before September 1, 1979. Delete this prohibition, because it is expensive, cumbersome, and has effectively prevented the city from taking steps necessary to equitable reduce energy waste and carbon emissions from the building stock. § 1-108	Advanced to City Attorney's Office for amendment drafting
Draft Language from Attorney		~~**Section 1-108. Mandatory Weatherization for Existing Buildings Requires Vote of the People.** Except for the provisions of the Building Code of the City of Portland in effect on September 1, 1979, the Council of the City of Portland shall not pass or enforce any ordinance, resolution, law or program mandating weatherization for any building or structure built in the City of Portland prior to September 1, 1979, unless such ordinance, resolution, law or program is referred to the citizens of Portland for a vote. (Add. Nov. 4, 1980.)~~	

Proposals
Pending Additional Information

PROPOSALS PENDING ADDITIONAL INFORMATION

#	Bureau	Proposed Charter Amendment(s)	Information Provided
AA	BDS & OEHR	Make the lists of protected class status consistent and update to fuller list specified in other charter sections. § 12-102.	Commission requested language proposal from City Attorney
Draft Language From Attorney		**Section 4-101. Merit Principle.** All appointments and promotions to positions in the classified service shall be made solely on the basis of merit and fitness demonstrated by a valid and reliable examination or other objective evidence of competence. Such appointments and promotions shall provide fair and equal opportunity without regard to protected classes under local ordinance, state or federal law ~~race, religion, gender, marital and family status, national origin, age, mental or physical disability, sexual orientation, gender identity, source of income, and such other criteria as determined by the City Council by ordinance~~. The goal of the merit system is a workforce that reflects the aspirations and values of the City it serves.	
		Section 12-102. Regulations and Restrictions. The ~~Council or the Commissioner to whom authority has been delegated~~ Mayor may make regulations and impose restrictions on public use of parks, recreational areas and facilities as found needed and appropriate, may exclude some or all kinds of vehicles from all or particular areas of any park or facilities, may limit to a particular class or classes of persons those permitted to use any particular area or facility if the limitation is not based on a protected class under local ordinance, state or federal law ~~race, color, creed or national origin~~, and may restrict the kinds and times of public use.	

PROPOSALS PENDING ADDITIONAL INFORMATION

#	Bureau	Proposed Charter Amendment(s)	Information Provided
AB	PPR	Make the lists of protected class status consistent and update to fuller list specified in other charter sections. § 12-102.	City Attorney proposing updated charter language to be consistent throughout charter
Draft Language From Attorney		**Section 12-102. Regulations and Restrictions**. ~~The Council or the Commissioner to whom authority has been delegated~~ Mayor may make regulations and impose restrictions on public use of parks, recreational areas and facilities as found needed and appropriate, may exclude some or all kinds of vehicles from all or particular areas of any park or facilities, may limit to a particular class or classes of persons those permitted to use any particular area or facility if the limitation is not based on a protected class under local ordinance, or state or federal law ~~race, color, creed or national origin~~, and may restrict the kinds and times of public use. [New sec. Nov. 8, 1966.]	

Timeline & Approach

Date	Activities
Oct 3	Commission Meeting with Public Comment – vote on amendments to send for drafting
Oct 4-10 (5 days)	City Attorney's Office drafts amendments
Oct 11	Commission Meeting with Extended Public Comment; updated vote
Oct 12-17 (4 days)	City Attorney's Office drafts amendments and revisions
Oct 18	Commission Work Session – vote on amendments to release for public hearings
Oct 19-Nov 8	Ballots mailed for November 2022 to Election Day
Nov 10	Phase II progress report #2 released with redline amendments
Nov 17 & 19 (est.)	Public hearings
Nov 28 (est.)	Written public comment closes
Nov 29 (est.)	Commission Work Session – deliberate based on public input & vote on any revisions
Nov 30-Dec 1 (est.)	City Attorney's Office drafts revisions
Dec 2 (est.)	Commission Work Session – review revisions & final vote
Post	Present recommendations to Council & release final progress report

10.3 Report to Commission

- Amendments
  - OEHR amendments re "disability" (previous agreement)
  - Any revisions to eight redlines advanced by Commission?
  - Protected classes amendments?
  - Auditor’s technical amendments?
  - Small Donors program?
  - Those NOT recommended by subcommittee
- Recommendation re council engagement / referral pathway
- Recommendation re stakeholder engagement / public comment solicitation

COMMUNITY ENGAGEMENT GOALS

Topic	Main Engagement method
Bureau & Office Proposed Amendments	Public comment • Goal: 50 public comments

How should we solicit public comment on the draft amendments?