



East Portland Action Plan

Morgan Tracy
Bureau of Planning and Sustainability
City of Portland

November 23, 2017

Dear Morgan,

Thank you and your team for answering our questions and giving us the opportunity to comment on the Discussion Draft of the Residential Infill Project.

East Portland is currently experiencing an unprecedented wave of housing instability. The current draft Residential Infill proposal will direct the creation of the new homes that current and future Portlanders will need.

Sadly, many current Portlanders will not live in these new homes unless steps are taken to ensure that those at low and middle incomes can afford them.

EPAP's community-generated goals, which were approved by the City Council in 2009, include mandates to work to "improve the appearance, quality and safety of existing housing stock," (EPAP Goal HD.2), "encourage housing that is attractive to households with a range of incomes" (EPAP Goal HD.5.6), and to "assist in stabilizing low income residents/families" in East Portland. (EPAP Goal SN.1)

Given our role as advocates for safe and affordable housing in East Portland, we wish to express our concerns about the exclusion of large portions of East Portland from the plan's Opportunity Zone overlay as well as the adequacy of the plan's strategy to incentivize the creation of affordable housing in Portland.

1. *Opportunity Zone overlay*

We believe that East Portland represents the future of Portland, and we are concerned that recent changes to the proposed Housing Opportunity Overlay Zone will leave large portions of our community out of the City's future growth in housing stock.

We share your concerns about displacement of low-income people, and we hope to participate in further discussions of the range of tools, both citywide and in East Portland, that will help support low-income peoples' housing needs. Still, we believe that the exclusion of these East Portland neighborhoods will stigmatize the investment that our area needs. We believe that East Portland's many large lots and vacant lots make much of this area a logical choice for creation of additional housing units, including ADUs.

In addition, we are concerned that the opportunity zone analysis neglects to consider the changing character of East Portland as gentrification continues. Current opportunity mapping doesn't consider changes that are already underway, or will be soon.

Further, East Portland has unique needs that argue for more housing opportunity here, not less. For instance, we are home to a disproportionate number of school-age children in Portland. For many recent immigrant families, in particular, there is a dire unmet need for units with more bedrooms. We hope that your team will work with us to identify ways that the code amendments can support meeting this need.

As you know, addressing underinvestment in East Portland is a core mission of EPAP. Methodologies that identify and perpetuate our community as an area of lesser opportunity are contrary to the values of EPAP and our City.

2. Incentives for affordable housing

Among the Residential Infill Project's stated purposes is to "increase housing options." But for too many Portlanders, historic increases in the cost of housing limit these options. Merely expanding the supply of housing without doing more is, for too many low-and moderate-income Portlanders, an empty promise.

While we are encouraged that the Residential Infill Project is anticipating incentives that encourage additional supply, we believe that the City is remiss in failing to use this opportunity to take affirmative steps to ensure it addresses the needs of those Portlanders for whom cost is the primary barrier to safe and secure housing.

Rights to higher density must be accompanied by guarantees that ensure that affordability is part of the new, denser housing in our single-dwelling residential zones.

We appreciate the work that BPS has done to bring this concept forward and we look forward to further conversations with you and BPS as the project moves toward completion.

Best Wishes,

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cc: Julia Gisler
Tyler Bump
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