October 24, 2018

Re: Residential Infill Project Guidance to Prevent Displacement in East Portland

Dear Mayor Wheeler, Commissioners Eudaly, Fish, Fritz, and Saltzman, Planning and Sustainability Acting Director Joe Zehnder, and the Planning and Sustainability Commission (PSC):

The East Portland Action Plan is a City-community partnership which has been tasked with leadership and guidance to public agencies on how to strategically address community-identified issues to improve livability and prevent displacement in East Portland. With the extension of the Residential Infill Project (RIP) into East Portland, the RIP will impact the following Action Plan strategy areas:

Housing & Development Policies (HD.3 and 5) and, Housing Assistance and Safety Net Services (SN.1 and 3).

Background:

The original ‘A’ overlay RIP map, which included all recommended RIP neighborhoods, included only one East Portland neighborhood -- the rest of East Portland was not included. Bureau of Planning and Sustainability (BPS) staff analysis showed that RIP could be a destabilizing and displacing force in certain East Portland areas which are already experiencing pressure from rising rents and rising home prices. Other East Portland areas were not included because of drainage problems, and in some cases, because of limited public transportation.

The RIP is currently in review before the Planning and Sustainability Commission, which has been consistently voted in committee to increase the impact of the RIP in East Portland. If adopted as proposed, the RIP will increase the number of allowable units on each lot within what is now traditionally single-family areas.

East Portland Action Plan Economic Development and Housing Subcommittees advise that the following be implemented if the RIP ‘A’ overlay is extended beyond the initial BPS recommendation into East Portland:

1. Before the Portland City Council votes on accepting a PSC report, we want property owners in East Portland must be notified about the change. City residents were notified of the original RIP and given ample time to respond
during an open comment period. Property owners, neighborhood associations and business associations in East Portland looked over that proposed RIP and saw that it did not include them. They need to know if it does include them and have significant time to address the adjustment. This change impacts a lot more people in East Portland than it did originally, and such a monumental change should not proceed without informed East Portland input.

2. Using an equity lens, create an East Portland Quadrant Plan equivalent that plans projects and zoning changes tailored to conditions specific to East Portland. East Portland is racially, ethnically, and language diverse, has more poverty than any other part of the city, and has multiple school districts with different needs to consider. There is a different pattern of street grids and many large undeveloped lots. Property values, while rising, are still lower compared to the rest of the city. A one size fits all RIP, created in response to problems in other parts of the city, will have unintended consequences for East Portland.

Establishing a Quadrant Plan equivalent prior to implementing the RIP in East Portland will lessen the unintended consequences. This Quadrant Plan equivalent will have the depth and project orientation of the downtown Quadrant Plan.

3. The original BSP staff report stated that the RIP could increase displacement in East Portland. There is no reason to doubt the basis of this analysis. East Portland needs a full range of anti-displacement mitigation programs in place BEFORE the RIP comes to East Portland.

Anti-Displacement Mitigation Programs Needed:
East Portland Action Plan insists that you put in place displacement prevention tools before you implement the RIP in East Portland. One consequence of hastily implementing the RIP in East Portland that is not planned, but is entirely predictable, is a continued and rapid displacement of current residents, especially people of color.

We advise the implementation of robust mitigation programs, using the example of inner northeast Portland as a cautionary tale. The City made extensive changes in that area without adequate mitigation programs in place. The result was widespread and, much regretted, displacement of too many people, notably, the now historically diminished African American community in the area. The City cannot claim naiveté as to the impact such changes make when intervention does not proceed implementation

The BLS staff made the following recommendations on what programs should be put in place before the RIP comes to East Portland:

"In support of vulnerable homeowners:

1. Offer outreach and education to low-income homeowners about the ‘A’ overlay provisions and their opportunities and risks.

2. Provide technical assistance to low-income homeowners on how to build additional unit(s) on their property and how to manage rentals.
3. Increase funding for financial assistance programs regarding:
   a. Home-ownership;
   b. Home-repairs;
   c. Down payment assistance; and
   d. Loans to homeowners to build additional unit(s) on their property.

Programs to support vulnerable renters of single-family homes:

1. Develop anti-displacement strategies for specific areas facing early stages of displacement risk;
2. Fund education programs for low-income renters regarding tenant rights, financial literacy and other skills that could help them stabilize their housing situation; and
3. Pilot a program to give qualified displaced households preference for affordable housing units in or near neighborhoods where they were displaced." (RIP Report page 50).

With robust programs in place, the changes in density and new building could be a way of creating wealth for East Portland homeowners. We know East Portland will change -- the City of Portland has charged the East Portland Action Plan to provide guidance, because we are a diverse group that establishes common ground in the best interest of East Portland. Take our guidance. Protect East Portland community rental tenants and build wealth for existing East Portland community members, not predatory investors.

Respectfully,

Kate Coenen
Chairperson on behalf of the East Portland Action Plan Economic Development Subcommittee

Frieda Christopher                John Mulvey
Co-Chairs on behalf of the East Portland Action Plan Housing Subcommittee

Mustafah Finney               Arlene Kimura
Co-Chairs on behalf of the East Portland Action Plan full consensus