



## Bureau of Planning and Sustainability

Innovation. Collaboration. Practical Solutions.

**DATE:** May 30, 2012

**TO:** Planning and Sustainability Commission

**FROM:** Tom Armstrong, Supervising Planner

**CC:** Susan Anderson, Director  
Joe Zehnder, Chief Planner;

**SUBJECT:** Limited Term Exemption Program - Proposed Multi-Unit Eligibility Map

### Overview

As part of the Portland Housing Bureau's (PHB) program changes to combine the Multi-Unit and Transit-Oriented Development tax exemption programs into a single program, there are proposed changes to the eligibility areas that remove some areas and include new areas in the program.

The Planning and Sustainability Commission received a briefing on these changes at a special meeting on May 3. Since then, BPS has circulated a revised eligibility map to affected neighborhood coalitions and associations and BPS and PHB staff have attended several meetings. In addition, PHB has maintained an online comment form for people to submit comments via the web. A comment log is attached.

### Proposed Eligibility Map

#### Areas To Be Removed

Previously, all areas within an urban renewal area (URA) were automatically eligible for the Multi-Unit program. Based on discussions with the Policy Review Committee, David Douglas School District, and other stakeholders, areas in URAs that are outside Metro 2040 designated centers, main streets, station areas and corridors have been removed from the program.

Note: The previous program map used a "broad-brush" approach that included all of the URAs and ¼ mile on either side of a corridor, regardless of the underlying zoning. This approach covered many areas with single-dwelling residential zoning that were not eligible under these programs. The new program map takes a more refined approach to identify eligible areas with appropriate multi-dwelling or mixed use commercial zoning.



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### Areas To Be Included

In order to reflect the Portland Plan guiding policy to encourage new affordable and accessible housing in close proximity to places with services and transit, the proposed additions are based on two criteria:

1. Metro 2040 designated centers, main streets, and station areas with transit service; and
2. Metro 2040 designated corridors with frequent transit service.

There are two exceptions to the criteria. First, the North Vancouver/Williams corridor is included even though it is not a designated Metro 2040 main street or corridor because it has multi-dwelling/mixed use zoning with transit service and is currently part of the program as part of the Interstate Corridor URA. In response to expressed concerns about the impact of tax-exempt development on David Douglas School District, potentially eligible areas with multi-dwelling residential zoning along SE 122nd Ave, south of Powell Boulevard, have not been included.

### Public Comments

There were a number of concerns expressed about the expansion of the LTE program being focused in Inner Southeast Portland. These concerns appear to have been mitigated by the revised map which expanded the eligibility areas, thereby creating more opportunity citywide.

In response to the revised map there are two specific comments to highlight:

#### *Buckman Community Association (letter attached)*

The BCA formally requests that the segment of the Belmont/Morrison couplet from SE 12<sup>th</sup> to 25<sup>th</sup> be removed from the program because this area has experienced numerous large-scale infill developments that are seen to conflict with the historic character of the neighborhood. Plus, the Buckman neighborhood already has a large share of publicly supported affordable housing.

*Response: In general, we think the Multi-Unit LTE program will not induce additional development in these areas, but will serve as an important incentive to include some measure of affordable housing units in development that may occur with or without this program.*

*We think the issues raised concerning zoning, density, neighborhood compatibility, and urban form are tangential to the Multi-Unit LTE program and more appropriately addressed through the Comprehensive Plan Update process. Given the LTE program changes are envisioned as a three-year pilot program with a built-in review and assessment period, we expect that review will be able to bring better alignment with the updated Comprehensive Plan.*



*East Portland Action Plan (EPAP) Housing Subcommittee*

The EPAP Housing Subcommittee commented that the four PDC Neighborhood Prosperity Initiative (NPI) areas in East Portland should be included in the LTE program.

*Response: The proposed map includes portions of all four areas - Parkrose, Division-Midway, 82nd Avenue and Division, and a small portion of the Rosewood area at 148<sup>th</sup> and Stark that is within ¼-mile of the MAX station.*

**BPS Recommendation**

We do not recommend any changes to the proposed program areas based on the public comments.

**Requested PSC Action**

We are asking the Planning and Sustainability Commission to recommend that the City Council adopt the proposed Mutli-Unit Limited Term Exemption Program map.



April 25, 2012

City of Portland, Oregon  
Bureau of Planning & Sustainability  
Geographic Information System

# Proposed Multi-Unit Limited Term Exemption Program

Multi-Unit LTE Program

Program Eligibility

- Designated Plan Areas / Metro 2040 Centers
- MAX Station Areas (.25 mi radius)
- Metro 2040 Corridors w/ 'Frequent Transit Service'
- Metro 2040 Main Streets w/ 'Transit Service'
- \* Eligibility extends .25 miles from these linear features.



The information on this map was derived from City of Portland GIS databases. Care was taken in the creation of this map but it is provided "as is" with no warranty for accuracy, omissions or positional accuracy.



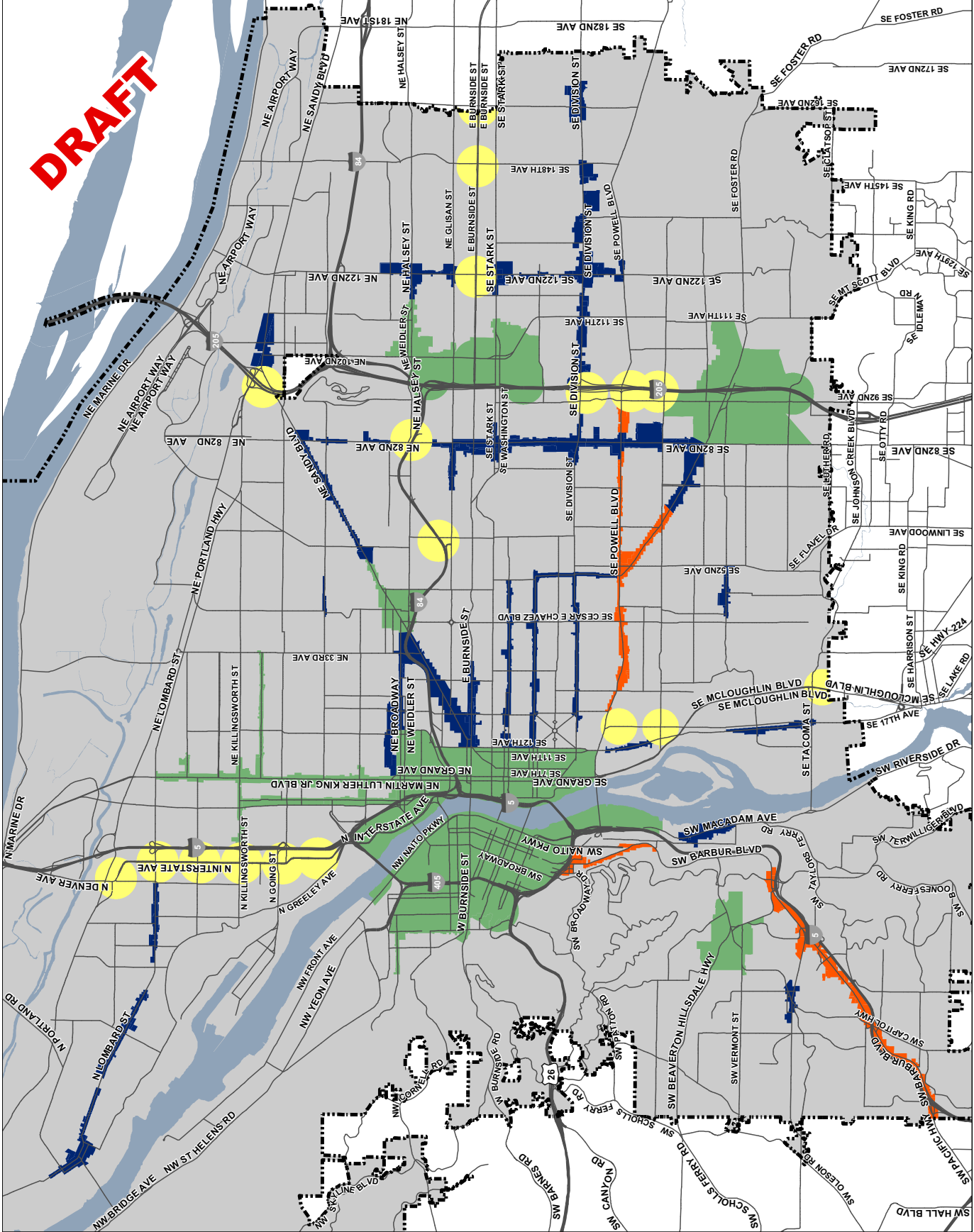
Bureau of Planning and Sustainability  
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City of Portland, Oregon  
Sam Adams, Mayor | Susan Anderson, Director

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# DRAFT





# BUCKMAN COMMUNITY ASSOCIATION

c/o Southeast Uplift 3534 SE Main Portland, OR 97214 (503) 482-8252

May 25, 2012

Kate Allen  
Senior Housing Policy Advisor  
Portland Housing Bureau  
421 SW 6<sup>th</sup> Avenue  
Portland, OR 97204

Dear Kate,

We write to submit formal response to a planned expansion of the Limited Tax Exempt Policy Review. We discussed the proposal at length both the land use and general membership meeting.

First of all, we wish to thank and commend you and those at the Portland Housing Bureau and Portland Planning and Sustainability staff for revising the original draft document. The proposal we reviewed showed the efforts made to increase the application of this proposal through more portions of the city of Portland, not solely limited to SE Portland as before.

We understand and support the intent of this plan to use tax payer support to promote more affordable housing with new development construction.

The new map shows an increase of areas of Buckman subject to the expansion, and we do not object to the application and extension through these areas of Buckman shown on the revised map with the \*exception of the Belmont/Morrison couplet\*.

The BCA formally asks and specifically requests that this stretch of the proposal (Belmont/Morrison) be deleted and excluded from the proposed plan.

Belmont and Morrison Streets have already experienced numerous large-scale infill developments, many of which have involved demolitions of existing historic, turn of the century housing stock.

As you may be aware, many residents in Buckman have been working tirelessly for a number of years to form a national historic district in Buckman to protect and preserve a Portland's oldest eastside neighborhood, portions of which were heavily demolished in the 1970s for the creation of an "apartment district".

Activists at that time organized to stop the demolitions by down-zoning portions of the neighborhood to protect the historic and beautiful Victorians and Old Portland homes.

Unfortunately, the zoning was not changed for many beautiful homes on Belmont and Morrison, and with the increase of profit to be made with multi-unit construction, these homes can be bought and "cleared" to make way for large scale, high-density "Mac-Velements", not subject to any sort of design

review. These new developments of today are large, multi-storied, studio and one bedroom boxes and often place tremendous pressure on the surrounding neighborhood. Some of these issues might be looked at with the upcoming Comprehensive Plan Review, but the LTE Review has preceded this, confounding and complicating that process.

The Buckman neighborhood has a very large degree of federally and locally tax supported affordable housing units and is and has been for years helping the city with this need. Even so, the proposed plan without Belmont/Morrison additions will still increase large areas in Buckman subject to LTE on both Hawthorne Blvd. and E. Burnside St.

But, we respectfully ask that you not create publically financed, financial incentives that further promote and encourage redevelopment and demolition pressure on the couplet streets, Belmont and Morrison, which we are the heart of our neighborhood and which many members of our community have been working tirelessly to protect and preserve historically and aesthetically.

The historic, existing housing stock offers families with children options to live and thrive in Buckman, impossible in the studio and one bedroom apartments that proliferate in the new developments, as well as home ownership opportunities that help to stabilize and support our schools and community.

Sincerely Yours,

Susan Lindsay  
Chair, Buckman Community Association  
Writing for and representing the full BCA Board

Cc:  
Commissioner Nick Fish  
Chief Planner Joe Zehnder  
Mayor Sam Adams  
Commissioner Amanda Fritz  
Commissioner Randy Leonard  
Commissioner Dan Saltzman

Category	Program	Comment Summary	From	Communication Type	Group or Location	Policy Response
<b>Program/Policy Recommendations</b>						
<b>Affordability</b>	Multi-Unit	Why is the low income percentage set at 60 percent Median Family Income (MFI) instead of 50 percent MFI?	Pauline Bradford	URAC meeting notes		Seventy percent of PHB housing tools are directed toward 0-30 percent MFI or 0-50 percent MFI so this particular tool reflects workforce housing affordability
<b>Affordability</b>	Multi-Unit	doesn't want "up to 80% MFI" in the language; wants clarification on definition of "family" (income and # of members) Only one window to apply;	Mary Ann Schwab	email		
<b>Application</b>	Multi-Unit	Pulling permits before applying may be necessary because of application window in July	Various	MULTE 040612 discussion		Within 3 year pilot, review how this works in the first year and potentially adjust as appropriate
<b>Application</b>	Multi-Unit	Consider a rolling application process. One six week period per year may not work for private developers.	Various	MULTE 040612 discussion		Needs legal review of statutory requirement
<b>Application</b>	Multi-Unit	Consider extending the MULTE program eligibility until project construction financing is secured. It can reasonably be argued that the ability to include affordable housing units in a project is not firm until financing is secured. The MULTE program could reduce development delays by defining the date closing on Application charging practices are limited by ORS 307. At the stakeholder meeting, PHB staff indicated they did not intend to charge developers the \$10,000 application fee until a point in the cycle when there would be little/no risk of non-approval. Metro TOD staff subsequently notified that ORS 307.615 and 307.621 budget cuts affect neighborhoods and offering \$ to private developers is offensive	Megan Gibb & Meganne Steele	written statement/email	Metro	Within 3 year pilot, review how this works in the first year and potentially adjust as appropriate
<b>Application</b>	Multi-Unit	How strict is cap? What if a project goes over by 10k but is a better fit than one that stays under cap; cap should be flexible	Megan Gibb & Meganne Steele	written statement/email	Metro	Needs legal review of statutory requirement
<b>Budget</b>	General	Funds should rollover to future years because development varies year to year	Christine Yun	email	SE Uplift	
<b>Cap</b>	Multi-Unit	Cap of 100 homes a year -If the economics of the County Government and School Districts are such that this is a reality, then we would reluctantly accept this. However I think that only looking at the immediate impact of the loss of the tax revenue is shortsighted. If the property would otherwise not be developed then the tax revenue would not be there anyway. The vacant land has been paying taxes for years, with no impact to the school or county systems. Also when a new home is built, there are taxes paid and jobs generated which further help the tax base. If the 100 home cap is a reality, I would strongly suggest applications one builder can make a year, thus preventing one builder or one company from coming in and taking 50 of the applications all in one day, eliminating them for the rest of the year	Aaron Wigod	MULTE 040612 discussion		Within 3 year pilot, review the impact of the cap, report annually
<b>Cap</b>	Multi-Unit	Cap of 100 homes a year -If the economics of the County Government and School Districts are such that this is a reality, then we would reluctantly accept this. However I think that only looking at the immediate impact of the loss of the tax revenue is shortsighted. If the property would otherwise not be developed then the tax revenue would not be there anyway. The vacant land has been paying taxes for years, with no impact to the school or county systems. Also when a new home is built, there are taxes paid and jobs generated which further help the tax base. If the 100 home cap is a reality, I would strongly suggest applications one builder can make a year, thus preventing one builder or one company from coming in and taking 50 of the applications all in one day, eliminating them for the rest of the year	Armstrong Stafford & Aaron Wigod	MULTE 040612 discussion		Within 3 year pilot, review the impact of the cap, report annually
<b>Cap</b>	Homeownership	Habitat's single family program targets 30-60 percent MFI. They offer 0 percent loans to clients but also rely on the LTE. They plan projects a year in advance. Martina thinks non-profit developers should be exempt from the cap. Habitat contributes to reducing the minority homeownership gap. Habitat is also increasing building; they will pull 47 permits this year and all of these	Justin Wood	survey	Home Builders Association of Metro Portland	PHAC recommends exempting from the 100 application cap Home Buyer Opportunity LTE applicants serving clients <60% income and w/ a long term affordability requirement (non-profit?)
<b>Cap</b>	Homeownership	Habitat's single family program targets 30-60 percent MFI. They offer 0 percent loans to clients but also rely on the LTE. They plan projects a year in advance. Martina thinks non-profit developers should be exempt from the cap. Habitat contributes to reducing the minority homeownership gap. Habitat is also increasing building; they will pull 47 permits this year and all of these	Matina Kaufman	Public Testimony at PHAC	Habitat for Humanity	PHAC recommends exempting from the 100 application cap Home Buyer Opportunity LTE applicants serving clients <60% income and w/ a long term affordability requirement (non-profit?)

Category	Program	Comment Summary	From	Communication Type	Group or Location	Policy Response
Cap	Homeownership	Laurie and Justin Wood both concerned with the lack of representation of homebuilders on the committee. Laurie said the cap of 100 homes per year limits their single-family building options. Laurie also mentioned the difficulty of family-run and other small businesses to meet equity goals. She said lowering the maximum sales price will push families into outer	Laurie Butler	Public Testimony at PHAC	Homebuilders Association	
Cap	Multi-Unit	Ted thinks there will be unintended consequences in Gateway and Lents. It costs the same to build there as in a more affluent neighborhood but projects cannot command the same rents as they would elsewhere. Currently, average housing stock is at 50 percent MFI, and he would like to see increased mixed income in Gateway. The new rules create a city-wide competition. Ted said the \$1M cap puts Gateway and Lents at a disadvantage. He said many areas would have to raise rents to qualify for the program. He wants to keep current program requirements intact for Gateway and Lents and would like the \$1M cap to not apply. He	Ted Gilbert	Public Testimony at PHAC	Gateway property owner	PHAC recommends establishing a scoring advantage for high-quality mixed-income Multi-Unit LTE projects in East Portland (bonus points?)
Cap	Multi-Unit	She said the cap requires developers to compete, which is sending the wrong message. She would like to see the existing policies remain the same for the eastside.	Colleen Gifford	Public Testimony at PHAC	Gateway EcoDistrict	PHAC recommends establishing a scoring advantage for high-quality mixed-income Multi-Unit LTE projects in East Portland (bonus points?)
Cap	Homeownership	John said he was on the Big Look Committee, and they talked about the 100 home cap Under extraordinary circumstances that number could increase. There could be unintended consequences of a strict cap.	John Miller	Public Testimony at PHAC	Oregon Opportunity Network	PHAC recommends exempting from the 100 application cap Home Buyer Opportunity LTE applicants serving clients <60% income and w/ a long term affordability requirement (non-profit?)
Development	Multi-Unit	Likes that tax break is for a limited period of time (loss of property tax can lead to neighborhood downturn & limit development).	Mike Warwick	email	Eliot Neighborhood Assoc	
Development	Multi-Unit	doesn't want historic homes torn down and replaced with apartments that target single white people.	Mike Warwick	email	Eliot Neighborhood Assoc	
Development	Multi-Unit	Likes that the program incentivizes developers and land owners to accomplish social objectives	Mike Warwick	written statement/email	Eliot Neighborhood Assoc	
Development	Multi-Unit	Developments meeting NMUH guidelines should be exempt from property tax if projects have at least 90% of the rental units at or below 60% of MFI. Without access to a property tax exemption, for-profit affordable housing developers will not be able to play an active role in keeping Portland affordable. Another suggestion would be to roll-over any unused portion of tax credit allotment to the following year. This would help build a larger pool of available credits during a slower building period and have a Equity goals are not realistic for small business developers	Rolanne Stafford	survey	Armstrong Stafford	Within 3 year pilot, review the impact of the cap, report annually
Equity	Homeownership		Justin Wood	email	Homebuilders Assoc	PHB's Priority Homeownership goal is Closing the Minority Homeownership Gap. PHB partners with community based organizations citywide who work to prepare minority homebuyers. A builder can meet this requirement by establishing a marketing relationship with one of these organizations.
Equity	Multi-Unit	What is the MWESB stipulation (percentage)		LUTC minutes, 032812		PHB reflects City's goals of 20% minority contractor participation



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<b>Equity</b>	Homeownership	Affirmative Action Marketing Plan – First let me say that I support these marketing plans and their efforts to support racial diversity in housing. However while these plans are the norm for larger multifamily commercial builders, government agencies or non-profits, they are quite cumbersome and not realistic to expect a single person small business home builder to have the time or resources available to him to them to prepare and maintain these plans. If this is a requirement, small single family While we are all concerned about social justice, I would urge you not to decide who gets to use LTE on the basis of race. The two homeowners that I know that got into their first homes using LTE would absolutely NOT have been eligible for the purchase without it. Neither of them is a minority, but they were certainly worthy buyers who were able to use this fabulous program. I do appreciate that Portland doesn't have a lot of cash - so while I wish we could do more than 100 applications, I understand there needs to be a cut-off at some point. Let's keep this program LTE housing in Eliot and Boise is mostly studios.	Justin Wood	survey	Home Builders Association of Metro Portland	PHB's Priority Homeownership goal is Closing the Minority Homeownership Gap. PHB partners with community based organizations citywide who work to prepare minority homebuyers. A builder can meet this requirement by establishing a marketing relationship with one of these organizations.
<b>Equity</b>	Homeownership		Rachel Gerber	survey	Acquaintance of two LTE homebuyers	DITTO
<b>Family Housing</b>	Multi-Unit	Homes that are non-profit developed or sponsored and either subject to an Affordable Housing Covenant or 60% MFI should not fall under a cap or carry bedroom requirements	Mike Warwick	written statement/email	Eliot Neighborhood Assoc	family housing priority in scoring
<b>Family Housing</b>	Homeownership	Developers may be dis-incentivized to build family units because of cost	Jesse Beason	email	Habitat for Humanity/Proud Ground	PHAC recommends exempting from the 100 application cap Home Buyer Opportunity LTE applicants serving clients <60% income and w/ a long term affordability requirement (non-profit?)
<b>Family Housing</b>	Multi-Unit	family units should be base tier requirement not second tier; doesn't want developers to build whatever they want and thinks PHB plan is short-sighted in regards to 20-minute neighborhood;	numerous	MULTE 040612 discussion		family housing priority in scoring
<b>Family Housing</b>	Multi-Unit	Buckman is already dense with affordable housing concerned about revenue impact to PPS	Christine Yun	email	SE Uplift	family housing priority in scoring
<b>Forgone Revenue</b>	General	Wants neighborhoods to be more involved in process before changes proposed; does not want to lose historic sense of SE neighborhoods to new construction; concerned about commercial rezoning	Dan Jung	email	PPS/Lents URAC	revenue impact to schools is replaced up to about 95% by State funding formula
<b>Public Involvement</b>	Multi-Unit	Big Look did not include any single family for-profit developers	Linda Nettekoven	email	SE Uplift	PHB will consider application requirement that developer demonstrate that they've met with neighborhood stakeholders, documented their input, and responded to concerns in project plan
<b>Public Involvement</b>	Homeownership	not enough public meetings and they were scheduled without enough notice; perception is that City was trying to "pull one over" on the public	Justin Wood	email	Homebuilders Assoc	Public outreach commenced immediately after City Council reviewed the Big Look committee's recommendations in early March, has touched URAC's, Neighborhood Coalitions, LTE program stakeholders, both the PHAC and the PSC for public testimony meetings, and continues through June 12th. Additionally, PHB has provided an online forum for feedback.
<b>Public Involvement</b>	General	Would like meetings to be later in the evening	Leah Dawkins	email	SE Uplift	
<b>Public Involvement</b>	General		Ryan Roser	email		

Category	Program	Comment Summary	From	Communication Type	Group or Location	Policy Response
<b>Public Involvement</b>	General	Proposed affected neighborhoods were not only left out of the entire proposal discussion and drafting process, but are also not directly included in any PHB/BPS outreach efforts. Requests to have PHB and BPS staff attend neighborhood meetings to explain this proposal and work with neighbors on concerns have been ignored or denied.	Central Eastside Urban Renewal Advisory Committee	Letter/email	Central Eastside Urban Renewal Advisory Committee	Public outreach commenced immediately after City Council reviewed the Big Look committee's recommendations in early March, has touched URAC's, Neighborhood Coalitions, LTE program stakeholders, both the PHAC and the PSC for public testimony meetings, and continues through June 12th. Additionally, PHB has provided an online forum for feedback.
<b>Public Involvement</b>	Homeownership	Lack of representation – The Big Look Committee did not include any single family – for profit builders. Had the committee included anyone from our industry then I feel these issues may have been raised and addressed before the current plan was formed. This fast-tracked proposal, seeks to be ratified ahead of the long-awaited and much promoted upcoming Portland Comprehensive Plan update which would provide direct public outreach on many of the issues of concern that these types of infill development subsidies create. The push to get this in place and promoting infill development in SE Portland ahead of the Proposed lowering of the max sales price of a home – I believe this is flawed fundamentally and the data that supported a lower sales price is not accurate. For the average sales price house in the program, takes into consideration condos and low income / non-profit homes. Including these houses brings down the average sales price by quite a bit. Also one of the stated goals of the program is trying to increase diversity and decrease gentrification. Lowering the max price of homes that can qualify for LTE will do nothing but further push families out into the outer neighborhoods of Portland. The LTE program is currently one way we are able to build a little nicer house, in closer in neighborhoods and get lower income families to qualify to buy them. Without the LTE program available, these neighborhoods Based on the sale price cap, and not figuring in condos, there are currently only 4 properties listed that would be available for LTE in North Portland. All are resale and two are only abated one more year. No new construction on the market would qualify. Four lots that could qualify unless prices for development of these go higher. The incentive to build at \$246k would not be there for builders. Some condos would be available as to age and may fall under the "density provision" (most do not have 3 bedrooms), but with HOA fees most condos will still not be affordable. You may save on taxes, but you end up making up for Lowering max price of houses will push people further out of town; if you are going to put a cap at 100 homes per year, you should limit how many applications each developer can submit Local priorities should align with state goals	Justin Wood	survey	Home Builders Association of Metro Portland	Goals of home ownership were represented by lender and non-profit Big Look committee members.
<b>Sales Price Cap</b>	Homeownership	Proposed lowering of the max sales price of a home – I believe this is flawed fundamentally and the data that supported a lower sales price is not accurate. For the average sales price house in the program, takes into consideration condos and low income / non-profit homes. Including these houses brings down the average sales price by quite a bit. Also one of the stated goals of the program is trying to increase diversity and decrease gentrification. Lowering the max price of homes that can qualify for LTE will do nothing but further push families out into the outer neighborhoods of Portland. The LTE program is currently one way we are able to build a little nicer house, in closer in neighborhoods and get lower income families to qualify to buy them. Without the LTE program available, these neighborhoods Based on the sale price cap, and not figuring in condos, there are currently only 4 properties listed that would be available for LTE in North Portland. All are resale and two are only abated one more year. No new construction on the market would qualify. Four lots that could qualify unless prices for development of these go higher. The incentive to build at \$246k would not be there for builders. Some condos would be available as to age and may fall under the "density provision" (most do not have 3 bedrooms), but with HOA fees most condos will still not be affordable. You may save on taxes, but you end up making up for Lowering max price of houses will push people further out of town; if you are going to put a cap at 100 homes per year, you should limit how many applications each developer can submit Local priorities should align with state goals	Justin Wood	survey	Home Builders Association of Metro Portland	PHB can consider allowing sales price up to the statutory limit of 120% of median sales price. This recommendation is broadly supported and may further both the goal of allowing the tool to be used by as many minority homebuyers as possible, and encouraging "middle-income" development in East Portland
<b>Sales Price Cap</b>	Homeownership	Proposed lowering of the max sales price of a home – I believe this is flawed fundamentally and the data that supported a lower sales price is not accurate. For the average sales price house in the program, takes into consideration condos and low income / non-profit homes. Including these houses brings down the average sales price by quite a bit. Also one of the stated goals of the program is trying to increase diversity and decrease gentrification. Lowering the max price of homes that can qualify for LTE will do nothing but further push families out into the outer neighborhoods of Portland. The LTE program is currently one way we are able to build a little nicer house, in closer in neighborhoods and get lower income families to qualify to buy them. Without the LTE program available, these neighborhoods Based on the sale price cap, and not figuring in condos, there are currently only 4 properties listed that would be available for LTE in North Portland. All are resale and two are only abated one more year. No new construction on the market would qualify. Four lots that could qualify unless prices for development of these go higher. The incentive to build at \$246k would not be there for builders. Some condos would be available as to age and may fall under the "density provision" (most do not have 3 bedrooms), but with HOA fees most condos will still not be affordable. You may save on taxes, but you end up making up for Lowering max price of houses will push people further out of town; if you are going to put a cap at 100 homes per year, you should limit how many applications each developer can submit Local priorities should align with state goals	Rachel Gerber	survey	Acquaintance of two LTE homebuyers	DITTO
<b>Sales Price Cap</b>	Homeownership	Proposed lowering of the max sales price of a home – I believe this is flawed fundamentally and the data that supported a lower sales price is not accurate. For the average sales price house in the program, takes into consideration condos and low income / non-profit homes. Including these houses brings down the average sales price by quite a bit. Also one of the stated goals of the program is trying to increase diversity and decrease gentrification. Lowering the max price of homes that can qualify for LTE will do nothing but further push families out into the outer neighborhoods of Portland. The LTE program is currently one way we are able to build a little nicer house, in closer in neighborhoods and get lower income families to qualify to buy them. Without the LTE program available, these neighborhoods Based on the sale price cap, and not figuring in condos, there are currently only 4 properties listed that would be available for LTE in North Portland. All are resale and two are only abated one more year. No new construction on the market would qualify. Four lots that could qualify unless prices for development of these go higher. The incentive to build at \$246k would not be there for builders. Some condos would be available as to age and may fall under the "density provision" (most do not have 3 bedrooms), but with HOA fees most condos will still not be affordable. You may save on taxes, but you end up making up for Lowering max price of houses will push people further out of town; if you are going to put a cap at 100 homes per year, you should limit how many applications each developer can submit Local priorities should align with state goals	Justin Wood	email	Homebuilders Assoc	DITTO
<b>Scoring</b>	Multi-Unit	five point levels may be impossible to attain	Meganne Steele	MULTE 040612 discussion		Statutory goals set the framework, local priorities set the policy
<b>Scoring</b>	Multi-Unit	reserving units for disabilities is difficult and lenders may not be convinced they will be rented; scoring should be based on how much a developer incorporates features for disabilities. If scoring has to be based on reserving units, maybe units would only have to be reserved for a certain period of time, like 30 days.	Aaron Wigod	email		scoring process under review
<b>Scoring</b>	Multi-Unit	reserving units for disabilities is difficult and lenders may not be convinced they will be rented; scoring should be based on how much a developer incorporates features for disabilities. If scoring has to be based on reserving units, maybe units would only have to be reserved for a certain period of time, like 30 days.	Aaron Wigod	email		Fair Housing law can be met in marketing units to a prioritized population

Category	Program	Comment Summary	From	Communication Type	Group or Location	Policy Response
Scoring	Multi-Unit	50 point minimum is concerning based on how points are divided; may only have a few applications that meet requirements for public benefits and meet 50 points	Aaron Wigod	email		scoring process under review
Scoring	Multi-Unit	high weight to affordability will result in developments with the most affordable units not other public benefits, Everyone will find a way to meet equity requirements and it won't give anyone an edge; other public benefits are not weighted high enough	Aaron Wigod	email		scoring process under review
Scoring	Multi-Unit	Concerns that developers can't meet requirements due to costs	Meganne Steele	MULTE 040612 discussion		
Scoring	Multi-Unit	Consider expanding scoring criteria to include transit-supportive characteristics/state legislation.	Megan Gibb & Meganne Steele	written statement/email	Metro	Baseline due to BPS map -
Scoring	Homeownership	Linda is concerned about the program changes affecting the David Douglas School District. There needs to be more incentive for a wider range of affordability and mixed income. The neighborhood is at a disadvantage because there are only two grocery stores in the area which are far from many properties. The neighborhood does not have buying power and cannot compete with other neighborhoods. She added the changes add	Linda Robinson	Public Testimony at PHAC	Gateway Urban Renewal Advisory Committee	
Scoring	General	How does social service line up against ADA law?	Gwenn Baldwin	URAC meeting notes		Marketing of units (special populations) is allowed under Fair Housing law. Units could not be restricted
<b>Map/Location Recommendations</b>						
Density	Multi-Unit	Please do not allow developers to build dense apartment buildings in our neighborhood.	Rafael Cabrera	Survey		
Density	Multi-Unit	Supports the program and wants more density in SE, especially affordable housing and more transit	Greg Moulliet	email	SE Uplift/Buckman	
Density	Multi-Unit	don't want developments concentrated in one street or district; can program require geographic dispersement of developments	Various	email	Buckman	4/26/12 map revision
Density	Multi-Unit	opposed to program; not enough parking; not enough funds for schools and repairs	Frank DiMarco	email	Division	
Density	Multi-Unit	Can we de-emphasize residential housing in EXd zone		LUTC minutes, 032812		4/6/12 map revision reflects current zoning in corridors
Density	Multi-Unit	rowdy young people and more traffic debases the historic nature of these neighborhoods. Tall apartment buildings overshadow homes in the area and look into backyards.	Mike Warwick	written statement/email	Eliot Neighborhood Assoc	
Density	Multi-Unit	Wants a "do no harm" policy for existing housing and neighborhood character	Mike Warwick	written statement/email	Eliot Neighborhood Assoc	
Density	Multi-Unit	The fact that this proposal came by initiation of PHB staff before our body (CEURAC) and not directly to the neighborhoods was curious, as the CEURA is, according to PHB staff, not directly affected. We disagree, as the health of the nearby residential neighborhoods is integral to the health of the industrial sanctuary. We have committee members and business owners on the URAC who are direct neighborhood representatives. Including too much high-density apartments in targeted zones in inner SE Portland can destabilize adjacent neighborhood communities and increase the already lopsided ratio of renter/home ownership rates, create parking, density and livability issues that would negatively impact the district. If housing is to be created, we urge PHB to look to the creation of	Central Eastside Urban Renewal Advisory Committee	Letter/email	Central Eastside Urban Renewal Advisory Committee	

Category	Program	Comment Summary	From	Communication Type	Group or Location	Policy Response
<b>Density</b>		Since a majority of property is zoned high density, some properties may not have the correct high density to qualify for this program. Is PHB going to work with the City to amend Eliot is opposed to the expansion of the zone to the area between Williams and Vancouver. This area south of Russell is expected to be rezoned EG from R to allow WEALTH CREATION from expansion of the current businesses that occupy that area. Too much gentrification in Mississippi and Williams	Bradley Perkins	URAC meeting notes		4/6/12 map revision reflects current zoning in corridors; no zoning changes as part of program revision
<b>Gentrification</b>	Multi-Unit	LTE program undermines N/NE policies--working class housing has long been occupied by African American residents. They will be pushed out. Housing should be for low-income residents and be built near employment of those residents. Low skilled work is mostly found in Beaverton and Gresham, not the inner city and transit from inner city to these areas is not convenient. Lots of units with little to no parking gentrifies the neighborhood and pushes out black residents.	Mike Warwick	Survey	Eliot Neighborhood Assoc	
<b>Gentrification</b>	Multi-Unit	Gives several examples of how black residents and businesses will be displaced by the program	Mike Warwick	written statement/email	Eliot Neighborhood Assoc	
<b>Gentrification</b>	Multi-Unit	Will the 5 mainstreets proposed by Mayor be included?	Mark Reed	MULTE 040612 discussion		Parkrose, Division-Midway, 82nd & Division Neighborhood Prosperity Initiative (NP) areas are Multi-Unit LTE eligible areas
<b>Map</b>	Multi-Unit	Will westside of Vancouver be included?	Mark Reed	MULTE 040612 discussion	Vancouver	
<b>Map</b>	Multi-Unit	Why are only certain SE streets considered; what is specific scoring for 2040 Main Streets; why is Powell included but not Broadway/Weidler; likes workforce housing but why specific to SE is inundated with development; should consider places like MLK instead; SE is unfairly targeted for pilot; target areas would cut through Buckman proposed historic district	Susan Lindsay	email	Buckman	4/26/12 map revision
<b>Map</b>	Multi-Unit	proposed map removes many N Portland neighborhoods from program	Christine Yun	email	SE Uplift	4/26/12 map revision
<b>Map</b>	Multi-Unit	Mount Scott/south of Johnson Creek is an upper middle class and wealthier area that should not be included and contributes little economically to the area	Barbara Quinn	email	North District	4/26/12 map revision
<b>Map</b>	Homeownership		Nick Christensen	email	Lents	area is included in a census tract which qualifies as "distressed" as measured