

TO: Portland Planning and Sustainability Commission, psc@portlandoregon.gov
FROM: Cully Association of Neighbors
RE: 2035 Comprehensive Plan, Proposed Draft

The following recommendations were prepared by an ad hoc committee representing the Cully Association of Neighbors, the Living Cully Coalition, Our 42nd Avenue, and the Cully Boulevard Alliance. They have been revised and approved by the Board of the Cully Association of Neighbors.

Recommendations for themes and concepts to be incorporated into the Comp Plan

A. Mitigating displacement. (Note: In August 2012 the City Council adopted the Cully Main Street and Local Street Plan, including a resolution that “Directs the Bureau of Planning and Sustainability and other bureaus to implement Portland Plan Action 97 by using Cully as a case study for developing policies and strategies that anticipate and address the displacement impacts of gentrification. This proactive approach will consider the transformation of the Cully neighborhood over time.” We await action on this resolution.)

1. Assess the impact of projects, plans and investments on housing affordability and displacement of residents and businesses.

- a. The “impact analysis” tool introduced in Chapter 5 of the draft plan should be strengthened and applied as an overarching policy covering the entire Comprehensive Plan, and applying to all City bureaus. Significant projects, plans and investments – including infrastructure investments, significant zoning changes, planning designations (e.g. “Neighborhood Center” designation) and private developments requiring land-use review – should trigger an assessment of impacts on housing affordability and the displacement of residents and businesses.
- b. In cases where projects, plans and investments are projected to contribute to displacement and loss of housing affordability, the impact analysis must include proposed mitigation strategies and investments.
- c. In the case of public projects, implementation of mitigation efforts must be included in the project budget.

2. Use land-banking as a tool to prevent displacement in gentrifying areas.

Remove residential and commercial properties from the private market, particularly in neighborhoods that are now experiencing or are projected to experience rising property values and rents, so that those properties can be used for permanently affordable housing and commercial spaces (e.g. through a land trust model). Explore a variety of tools to acquire properties, including acquisition of foreclosed properties.

B. Housing

- 1. Encourage permanently affordable housing models for both homeownership and rentals.**

- a. Throughout the plan, references to encouraging homeownership should add an emphasis on permanently affordable homeownership opportunities (i.e. community land trusts, limited-equity cooperatives), so that homes remain affordable for future owners and subsidies are not lost when the initial owners sell.
 - b. Ensure that subsidized rental units are permanently maintained as affordable units.
- 2. Pursue inclusionary zoning and other tools that create affordable units in new market-rate housing developments.**
- The City should aggressively pursue tools such as inclusionary zoning that create permanently affordable housing units in private developments – through lobbying at the state level to lift the ban on inclusionary zoning, implementing other existing models and developing new land use tools.
- 3. Support development of smaller homes.**
- a. Support the development of smaller homes in single dwelling zones to provide market-based affordable housing, accommodate a wider variety of household sizes, decrease resource use and carbon impacts associated with larger homes, and preserve the character of existing neighborhoods.
 - b. This could be accomplished by creating more flexible rules for accessory dwelling units, allowing large old homes to be internally divided into small units, and scaling Systems Development Charges based on home size.
 - c. Offer density bonuses in single dwelling zones in exchange for smaller home sizes and/or permanently affordable housing.
 - d. Expand the palette of housing choices throughout the city, including family-friendly development in high density zones and small households in single dwelling zones.

C. Neighborhood economic development

1. Stability as an overarching economic development goal

To prevent displacement of vulnerable small businesses, add “stability” as a foundational citywide goal for economic development.

2. Neighborhood businesses and industrial policy

Strategies for industrial economic development should more thoroughly integrate neighborhood district businesses to find economic synergies. As the city seeks to replace foreign-made goods and services in industrial processes, neighborhood district businesses should be supported to fill niches in industrial supply-chains.

3. Equitable access to employment

Strategies for employment land should account for equitable access to employment, particularly in the Columbia Corridor. Equitable access can be defined in terms of transportation access for incumbent populations in economically vulnerable communities. Additionally, equitable access should

include the concentration of employment and business development resources in historically underserved communities, in order to help disadvantaged community members more easily find employment or open businesses.

4. Neighborhood business districts

- a. Neighborhood business districts should be hubs for business development by the immediate, incumbent population. Policies should enhance access to space for emerging businesses and entrepreneurs. Measures of accessibility should consider the affordability and size of space, as well as use-diversity. Special attention must be given to ensure that neighborhood-based businesses are not involuntarily displaced, including manufacturing businesses that are vulnerable to replacement by retail and office uses.
- b. Neighborhood-scale decision-making structures (e.g. the Neighborhood Prosperity Initiative model) should be encouraged to bridge residential and business concerns and respond to neighborhood-specific challenges, including displacement pressures. Such programs can serve as conduits to public resources for employment and business development, and encourage local hiring by neighborhood businesses. Additionally, they should be empowered to engage commercial property owners and developers toward the end of community-beneficial development. The primary purpose of neighborhood-scale economic development decision-making should be to ensure that economic change benefits members of the incumbent community with greater access to needed goods and services, as well as employment and entrepreneurship opportunities.

5. Small business incubation

Regulations that impede business incubation should be reexamined. Restrictions on home-based businesses and temporary markets should be relaxed where appropriate to encourage community-based entrepreneurship.

D. Transportation—Address historic inequity

Goal 9.D. Equitable transportation is an admirable aspiration and essential to achieving the equity goals of the Comp Plan. We would like to see that goal emphasized more in a number of policies. The plan needs to specifically address the historic inequity affecting low income neighborhoods that were annexed in the 1980's. These neighborhoods lack the infrastructure enjoyed by older Portland neighborhoods, including paved streets, curbs, sidewalks, street lights, and public transit. They consequently lack safe affordable access to jobs, schools and parks. Residents of these neighborhoods, some still paying for sewers, cannot bear the cost of building this infrastructure through local improvement districts. The plan should explicitly give priority to these neighborhoods for improvement in policies concerning Affordability (9.8), Geographic policies (9.9), Pedestrian networks (9.19), and Transit equity (9.27).

E. Environment and Watershed Health

1. Connect green areas to one another with migration corridors so that wildlife can safely circulate within urban areas.
2. Prioritize and incentivize brownfield redevelopment.
3. In areas where industry abuts residential uses, encourage good neighbor practices that mitigate noise, odors and pollution so that industry and neighborhoods can coexist.
4. Identify areas with poor soil infiltration and limited public storm water facilities and create incentives for existing developments within those zones to emulate predevelopment conditions through storm water catchment and treatment to mitigate impacts on overtaxed watersheds.
5. Require native trees and vegetation in all natural resource areas.

Recommendations for specific changes to policies and the addition of new policies

Chapter 1—Guiding Principles

- **Policy 1.15**—Clarify that the goals and policies of existing neighborhood plans are “incorporated by reference” into this plan so that they continue to have the force of law in land use cases (except where they conflict with this plan). The phrase used in the draft, “are still in effect,” is subject to interpretation.

Chapter 5—Housing

- **After Policy 5.39 (Page GP5-11)**
Add new policy to create safe, sanitary housing options for homeless and/or extremely low-income residents that meet all life safety requirements of the maintenance and landlord/tenant codes (i.e. egress, smoke detectors, ventilation, handrails...), but not necessarily the full standards for new construction under today’s building and zoning codes. Allow experimentation with low-cost models with non-traditional housing forms, and support self-organized efforts by individuals experiencing homelessness to provide housing for themselves.

Map recommendations

Do not change the current zoning of ‘Sugar Shack’ property at the intersection of NE Cully Blvd. and Killingsworth St. Retain the current EXdh designation to allow flexibility in development for the community organizations who are buying the property.