



The League of Women Voters of Portland

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DATE: March 13, 2015

TO: Chair Andre Baugh, Planning and Sustainability Commissioners

FROM: League of Women Voters of Portland
Margaret Noel, Co-president
Debbie Aiona, Action Committee Chair

RE: **Comprehensive Plan Update**

The League of Women Voters of Portland appreciates the time and attention the Planning and Sustainability Commission (PSC) has devoted to updating Portland's Comprehensive Plan. The League has a long-standing interest in affordable housing and is submitting the following suggestions for your consideration.

Housing Policy: Affordability

- PSC should consider retaining the current Comprehensive Plan Housing Policy that calls for matching the citywide income profile in areas where significant housing development is anticipated, such as opportunity areas and urban renewal districts. This policy has provided a clear standard by which to measure the city's progress in meeting the community's housing needs. Because it is based on the income profile of the city as a whole, it supports the city's desire to create balanced communities.

- The proposal in the current draft plan aims to have 30 percent of housing stock affordable to households earning 0 – 80 percent of Median Family Income (MFI). Such a large range likely will result in an overabundance of housing affordable to those at 80 percent MFI and exacerbate the extreme shortage of housing for very low income households. Far and away, the city's greatest shortfall is at 0 – 30 percent MFI. Narrower and more clearly defined ranges would help focus expenditures where they are needed most and promote more accurate tracking of the city's progress in meeting the housing needs of our most vulnerable residents.

- The city's Tax Increment Financing Set Aside policy limits urban renewal spending to 0 – 60 percent MFI projects. City Council arrived at this policy because

“To promote political responsibility through informed and active participation in government.”

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1) the need is greatest at these income levels, and 2) most of the funds used to supplement the TIF resources are restricted to housing at 60 percent MFI and below. If the PSC decides to adopt a 30 percent goal for affordable housing in the Central City, then it should consider making the upper limit 60 percent MFI and break that down into two ranges: 0 – 30 percent MFI and 30 – 60 percent MFI. These ranges also conform to accepted tracking and reporting practices.

- In large redevelopment areas or when public funds are used for significant infrastructure improvements, we ask you to require housing developments to include 30 percent of the units affordable to households at 0 – 60 percent MFI with the split between 0 – 30 and 30 – 60 percent MFI to be based on the city's income profile.

Other Recommendations on Housing

- Require preservation of existing affordable housing, both subsidized and unrestricted affordable, as this is critical to maintaining an adequate stock that meets the needs of the city's residents.
- Add a statement stressing the importance of requiring permanent affordability for publicly subsidized housing units. Permanent affordability prevents displacement and guarantees the availability of those units to lower income households regardless of market forces.
- Add a goal calling for expanding financial resources for affordable housing. It will take more than tools to meet the city's housing needs.
- Include a statement acknowledging the importance of non-profit affordable housing developers.
- Acknowledge the importance of affordable housing as infrastructure.

Thank you for considering the League's recommendations. Again, we truly appreciate your work on this project.