

Thank you for working to update the Comprehensive Plan. I'm pleased that you will be including targets for affordable housing, as I consider this an essential component of any community planning process.

I am submitting my comments as someone who has spent most of my career working on affordable housing: ten years as executive director of the Housing Development Center, five years as director of the Bureau of Housing and Community Development, and five years as housing advisor to Senator Jeff Merkley.

First, I would urge you to be more explicit in setting the city housing goals. As you know, housing policy that is related to income is typically established based on the different income levels - expressed as a percentage of the median family income (MFI) for a given geographic area. The characteristics of households at 80% MFI are very different from those for households at 30% MFI, and the housing cost and available tools will vary greatly based on these income levels.

I therefore recommend that the section on housing go beyond setting a single target for people at or below 80% MFI. Portland's plan should include explicit numeric targets for development and preservation of housing affordable to extremely low income (30% MFI and below), very low-income (50% and below), and low income (80% MFI and below). These more granular goals will be extremely important as strategies are devised to create balanced communities.

Secondly, those of us who have spent decades working on housing consider affordable housing to be community infrastructure, just like parks and roads. That's why it is important that the housing be affordable permanently, or at least for sixty years - as currently required by City policy. The need for affordable housing will not go away, so we must plan for it and preserve it for the long term. I request that the City develop a companion to the 2014 List of Significant Projects (July 2014), that describes housing strategies that align with infrastructure investments that could lead to gentrification and displacement, in an effort to ensure we have done all that is possible to avoid displacement of existing populations when public investment elevates the real estate values of a given area.

Thanks for considering these comments, and don't hesitate to contact me if you'd like to have any further conversation of these matters.

- Will White

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