



# City of Portland

## Design Commission

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10/25/2016

To: Portland Planning & Sustainability Commission  
From: Portland Design Commission  
Re: Inclusionary Housing Zoning Project

Thank you for the opportunity to comment on the proposed Inclusionary Housing (IH) amendments to Title 33.

The Design Commission provided testimony to the Planning & Sustainability Commission on the “Mass Shelters and Housing Zoning Code Update” in mid-September. Our testimony centered on the creation of a separate design review track for housing developments that included some level of undefined City subsidy. It was the Design Commission’s position that:

- (1) the anticipated presence of City funds in Inclusionary Housing would have undiscovered consequences on the delivery of both market rate and affordable housing units; and
- (2) a two-tiered system would be created in which people of modest economic means would live in housing developed to a lesser standard that was, ironically, supported by public dollars.

Similar issues are potentially present in the roll out of IH.

The Portland Design Commission’s familiarity with the proposed revisions to both Title 33 and Title 30 are limited to a single 60-minute briefing from the Bureau of Planning & Sustainability. As we’ve had no contact with staff from either the Housing Bureau or Development Services we are unfamiliar with almost all issues surrounding the implementation of IH. Therefore, our optimistic expectation of outcomes is predicated on the assumption that the economic impacts of IH on the production of both multi-family rental housing and multi-family homeownership housing have been thoroughly vetted by development experts and staff of the impacted bureaus, and the ratios proposed—mandatory 20% of units at 80% Area Median Income and voluntary 10% of units at 60% of Area Median Income—will not have a detrimental impact on the 2035 Comprehensive Plan’s overall housing goals. If this isn’t the case, IH will not be the direct and significant means of implementing the Plan’s housing affordability goals that our community wants it to be, but rather a clumsy tool likely to further aggravate the housing market and harm our ability to achieve said housing affordability goals.

There is no place for inequitable housing in our community. In every structure, the type, size, location, and amenities provided to residents of affordable units must be physically and characteristically identical to those provided to residents of market rate units and this must be addressed through the appropriate Titles within the City Charter. As a further guarantee of equity, the Design Commission recommends the IH code take a page from the subsidy playbook of some of our local affordable housing developers: provide “floating” subsidy within each building rather than tying subsidy to specific housing units. This approach allows building owners to deliver on the terms of their IH commitment without disrupting the lives of residents whose household economics are on an upward trajectory.

Finally, the Design Commission believes that any potential revision to Title 33 that impacts building massing and/or building height needs to be modeled at the quarter-block, half-block, and full-block scale to be fully understood, and that the results of this work should be vetted in public forums comparable to those held during the outreach phase of the Comprehensive Plan.

Thank you for your consideration,

David Wark, Chair of the Portland Design Commission

Cc: Design Commission  
BDS Staff