

Preliminary Racial Equity Analysis

OF NW STREETCAR EXPANSION
AND RELATED LAND USE CHANGES



July 2019



PBOT
PORTLAND BUREAU OF TRANSPORTATION



Bureau of Planning and Sustainability
Innovation. Collaboration. Practical Solutions.
City of Portland, Oregon

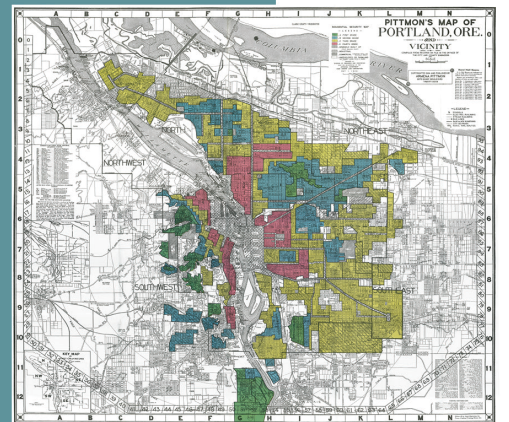


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This process was led by Irene Schwoeferman and Ryan Curren from the Portland Bureau of Transportation (PBOT) and Bureau of Planning and Sustainability (BPS) respectively. Additionally, Tony Lamb from BPS, Eric Engstrom from BPS, Court Morse from Prosper Portland, Jessica Conner from the Portland Housing Bureau, Danielle Brooks from the Office of Equity and Human Rights, Andrew Plambeck from Portland Streetcar Inc., Kathryn Levine from PBOT, and Christopher Sun from PBOT, contributed significantly to this process.

INTRODUCTION

The City of Portland is evaluating whether to expand streetcar further into Northwest Portland and make related land use changes. In addition to determining if these changes support City objectives such as increased transit use, expanded housing options, and reduced carbon emissions, we should ask how the changes can reduce or exacerbate long-standing racial disparities in our community. Such an analysis is called for in the Guiding Principles of the new 2035 Comprehensive Plan. This analysis begins to identify an approach to answering these questions.

We know the benefits of past public infrastructure investments and land use planning processes disproportionately accrued to wealthy and predominately white landowners while people of color often carried burdens such as involuntary displacement. The City has recently adopted new equitable growth policies and is committed to future growth that supports people of color and explicitly reduces long-standing racial disparities.

As is often the case with racial equity analysis, the answers are nuanced. There is not an either/or answer but often a yes/and. This does not mean that we should or should not make investments and pursue land use changes that broadly meet our objectives. We must consider actions beyond traditional regulatory changes and status quo infrastructure investments to ensure that an expansion of the streetcar in NW Portland will equitably benefit people with lower-incomes and people of color.

The analysis describes the anticipated and disproportionate burdens as well as the likely benefits and opportunities to advance racial equity. Potential strategies for avoiding or mitigating burdens and enhancing benefits are identified. Recommendations are also provided for making the next phase of planning an inclusive process that takes the City's practice of racial equity analysis and planning to a higher level of integrity and sophistication.

The Office of Equity and Human Rights and the Office of Civic Life developed a [Racial Equity Toolkit](#) (RET) acknowledged by [a City Council resolution](#), to guide the City's decisions to advance racial equity. Our analysis closely follows the RET process and serves many of the same functions. However, this analysis has two significant limitations that would have been addressed using the full RET:

1. **A fundamental question is not answered**, "From an equity perspective, should the City expand streetcar into Northwest given the transit and economic development needs in other parts of the city?" This question should be answered within a broader discussion of how the streetcar and other potential transportation investments contribute to the City's racial equity goals.
2. **A lack of community engagement** in this process should be taken as a major caveat to the findings and recommendations. This preliminary analysis should be viewed as a starting point for the next phase of planning for staff to engage those communities of color most impacted by the proposed streetcar expansion and land use changes. Engagement should challenge the City's assumptions, identify community issues and priorities, strengthen relationships between City staff and community members, and provide opportunities for accountability.

BACKGROUND

The introduction of streetcar and five land use scenarios are the subject of this analysis. The five land use scenarios were collapsed into three for ease of analysis during our process:

1. Scenario 1: Streetcar introduced but current land uses are maintained
2. Scenarios 2: Streetcar introduced with Central Eastside light industrial and office industrial type land uses; light industrial, offices, institutional uses
3. Scenarios 3: Streetcar introduced with Pearl District or South Waterfront type land uses; mixed-use vertical residential development, office, retail and services

Streetcar has dual purposes of providing a new transit option and as a tool to spur dense urban development and placemaking. Therefore we analyzed the impacts of introducing a NW streetcar together with the land use changes.

Other documents developed in BPS's full streetcar expansion study describe how a streetcar expansion route in Northwest was chosen, the ongoing engagement with property owners, details on each land use scenario, and projected changes to land values, housing, and jobs.

Policy Guidance and Equitable Outcomes

In 2015 the City of Portland adopted [city-wide policies](#) to eliminate racial inequities in City practices and policies. Additional equity-focused policies specific to urban planning, development, and public infrastructure were adopted in the 2035 Comprehensive Plan (see Appendix 1 for relevant policies). As a key step in the equity analysis, we reviewed Comprehensive Plan policies to then craft a set of desired equitable outcomes, in order of priority:

- 1. Private economic benefits resulting from land use changes and public investments in streetcar contribute directly to an equal amount of public economic benefits for POC**
- 2. Maintain an adequate supply of industrial lands that serve as a leading source of middle-wage jobs that do not require a 4-year college degree and expand access for POC to those jobs**
- 3. Communities of color have greater self-determination, capacity, and decision-making authority to benefit from any change and shape the outcomes**
- 4. Increase permanently affordable housing choices for people of color (POC) near quality transit, living wage jobs, and educational opportunities**
- 5. Decrease relevant regional racial disparities such as displacement pressures on POC households, housing cost burden, commute times, self-sufficient wages, job training, and business ownership**
- 6. Public and private land is held in reserve for affordable housing and affordable commercial space for POC-owned businesses**

Relevant History

There are at least three periods in the history of Northwest Portland that have had deep impacts on where we are today, in terms of racial and social equity.

Early Development

It is impossible to examine this topic without a reminder that the Native American inhabitants of Portland outnumbered white settlers for much of the 19th century. The violent removal of native peoples from villages the area now called Portland has left deep scars that still impact people today. Thousands of native people continue to live in Portland. The Warm Springs, Grand Ronde, and Yakima tribes all have some ancestral tie to the Portland area.

Later, Asian immigrant laborers and their descendants built many of Portland's railroads and much of the early housing and commercial buildings of Portland. An early Chinese community grew up around a group of Cantonese farmers working vegetable gardens in the vicinity of what is now Goose Hollow. Asians were racially segregated from whites in early Portland, and children were banned from attending public schools. The period 1882-1943 was known as the Exclusion Era. During this period, many Asian immigrants could not legally enter the United States (Oregon Historical Society).

In 1942 people of Japanese ancestry were removed from Portland neighborhoods and incarcerated in camps in the Great basin states. There are people still alive in Portland today who experienced this firsthand.

20th Century Redlining

The federal government's practice of redlining directly impacted a part of the study area then named South Portland Heights. This tool made it difficult or impossible for non-white residents to receive residential and commercial loans. Categorization of the neighborhood was in part determined by the average income and racial and ethnic makeup of the area.

In 1937, an appraiser of the neighborhood noted, "Detrimental Influences: Encroachment of business and light industry. Infiltration of subversive racial elements." Occupations in the area were "small merchants, white collar and industrial workers, artisans, laborers, etc." and non-white families were identified "85 Chinese, 60 Filipinos, 100 Japanese."

In comparison, just to the west Westover Terrace was "Greenlined" due to a more homogenous, white, higher-income population, and single-family zoning. An appraiser noted, "Zoned single-family residential. (Racial) Deed restrictions have expired but zoning and topography offer ample protection." Occupations of residents were listed as "professional men, executives and capitalists."

Urban Redevelopment

The land use transformation opportunity between Vaughn and Nikolai is roughly analogous to the transformation of the Pearl District, which started in the mid-1990's. In 1990 much of the area north of Burnside Street was zoned industrial, with no housing development allowed. What is now the core of the district was the Hoyt Street Rail Yard. Lovejoy street passed over the district on a viaduct. Freight trains regularly delivered supplies via a heavy rail spur on NW 11th Avenue to the Henry Weinhard Brewery on West Burnside. NW 13th was an unpaved street, dominated by enormous potholes.

A pivotal decision was the 1995 adoption of the River District Plan, and a corresponding development agreement with Hoyt Street Yards - a private entity that had purchased the defunct rail yard. The plan included a new urban design concept, zoning map and code changes to facilitate housing, and street plans. The private-public development agreement outlined a series of commitments that the property owner and the City would make, including parks investments, streetcar construction, and streets. In exchange for public investments, the property owner agreed to meet housing targets. An urban renewal district was used to finance public investments, and the pace of the public investments was tied to the pace of private housing investment. One of the first residential buildings in the Pearl District was the 1997 Pearl Court Apartments, a 199-unit affordable housing project serving residents earning between 40% and 60% of area median income. Over the next 20 years over 1,260 units of regulated-affordable housing was built in the district. Although the pace of affordable housing production in the Pearl has been criticized at various times, especially relative to the large amount of market rate development that eventually occurred, it remains one of the largest concentrations of affordable housing investment in the City's history.

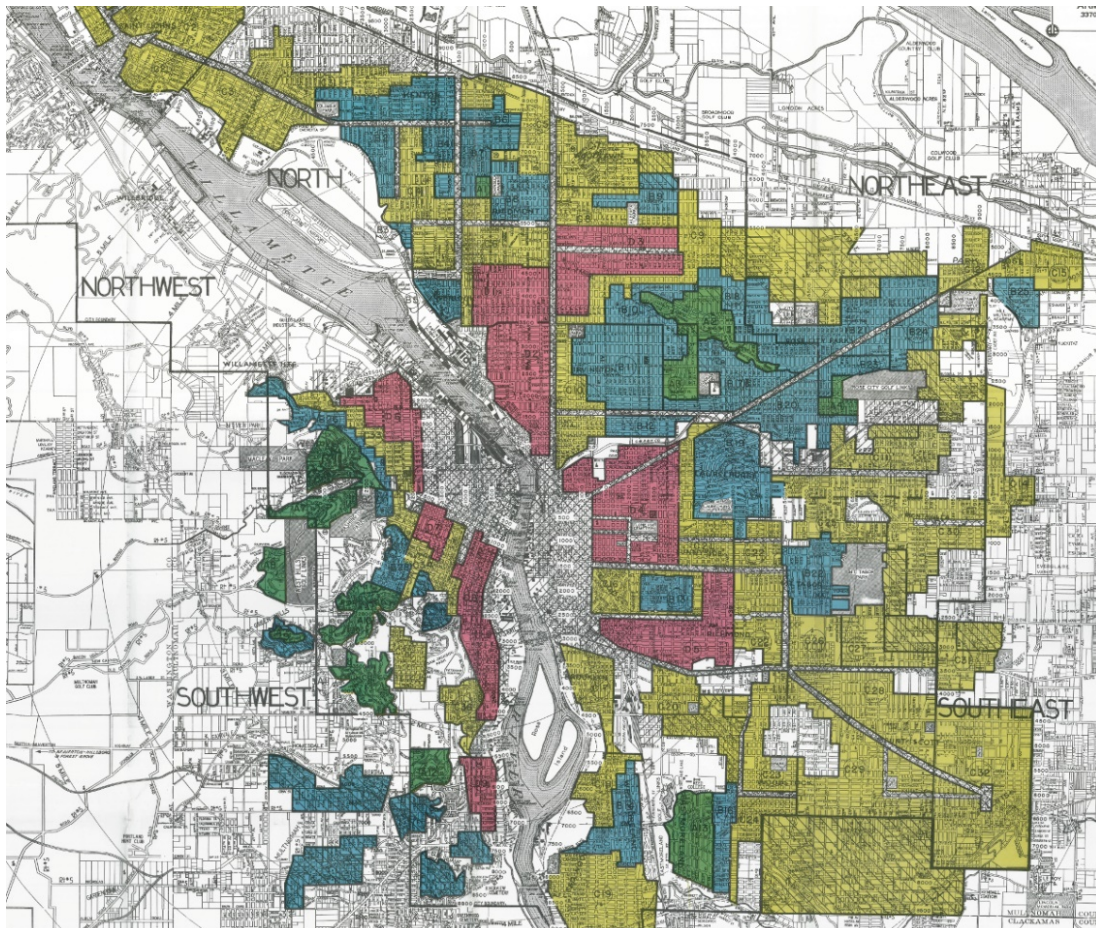


Figure 1. Home Ownership Loan Corporation map of Portland, 1937

Current Equity-Conditions and Racial Disparities

The “Jobs and Housing Trends” chapter of this report provides some current demographic and housing information for the study area. Our analysis looked at some indices of data that use multiple data points to capture the interconnectedness of racial disparities and the structural racism that underpins them. Given the city-wide implication for streetcar expansion we also looked at city-wide racial disparities that could be reduced or exacerbated by a NW expansion.

City-wide disparities

Figure 2 shows renter households who are cost burdened by the racial or ethnic group of its householder. In Portland, 51 percent of non-Hispanic White households spend more than 30 percent of their income on rent, while 58 percent of households of color and 69 percent of Black households are housing cost burdened. For the purposes of considering racial equity outcomes for new housing resulting from streetcar expansion, understanding the racial makeup of cost-burdened households across the city is important.

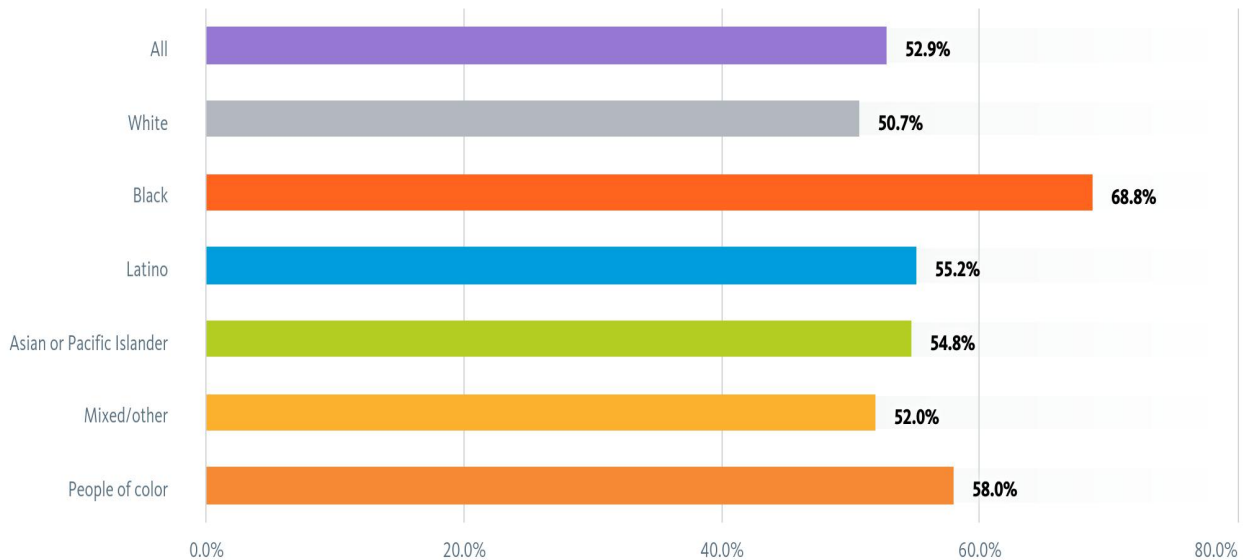


Figure 2. City of Portland renters’ housing burden by tenure and race/ethnicity, 2015, PolicyLink/PERE National Equity Atlas

Household income disparities by race and ethnicity are worsening even as incomes have risen overall. Median income levels have only increased among White households, and decreased among African American, Hawaiian-Pacific Islander, and Native American populations.

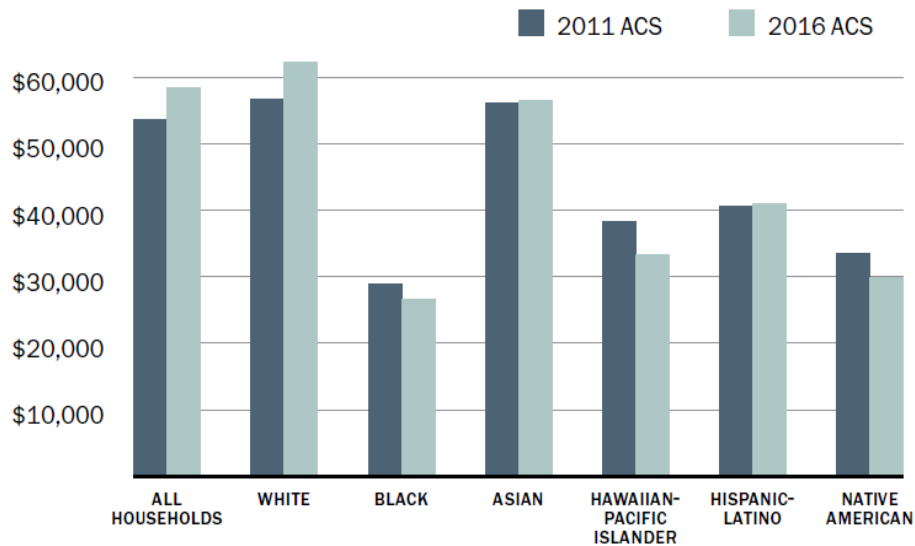


Figure 3. Household income by race/ethnicity, U.S. Census Bureau, 2011 and 2016 5-year ACS estimates. Portland Housing Bureau.

Industrial jobs provide high wages and require lower educational attainment, serving as a major economic mobility opportunity for low-wage workers. These jobs are disproportionately held by people of color. This profile of industrial jobs is important to consider if we consider rezoning industrial land and the resulting change in job mix in the study area.

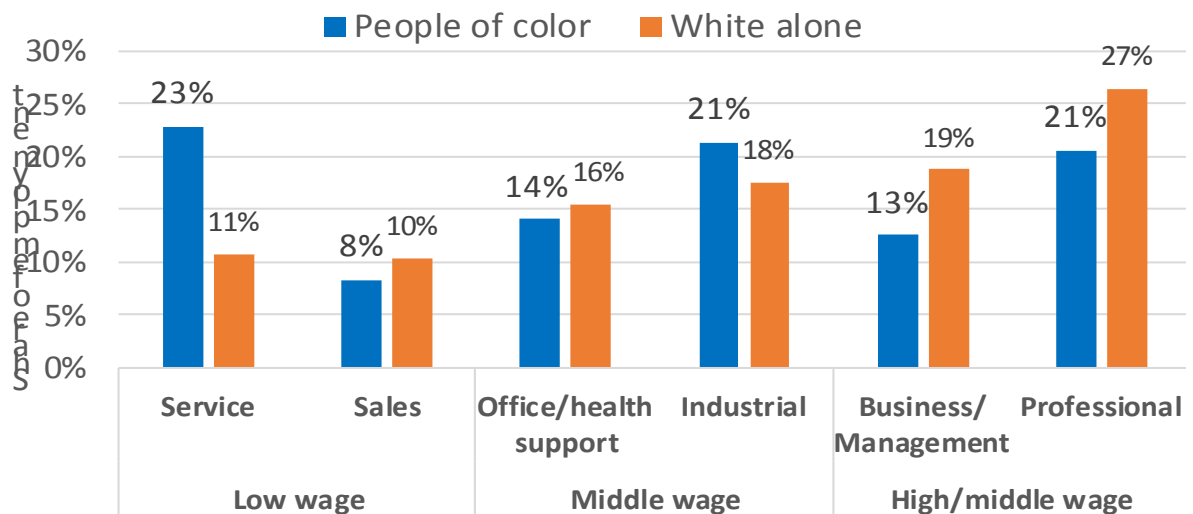


Figure 4. Racial employment disparities by occupation group, Portland MSA, 2017, Bureau of Planning and Sustainability

Equity indices

PBOT's Equity Matrix shows a combination of indicators of households' vulnerability to rapid neighborhood change and increased costs of living. There are more renters and households of color in the southern part of the study area.

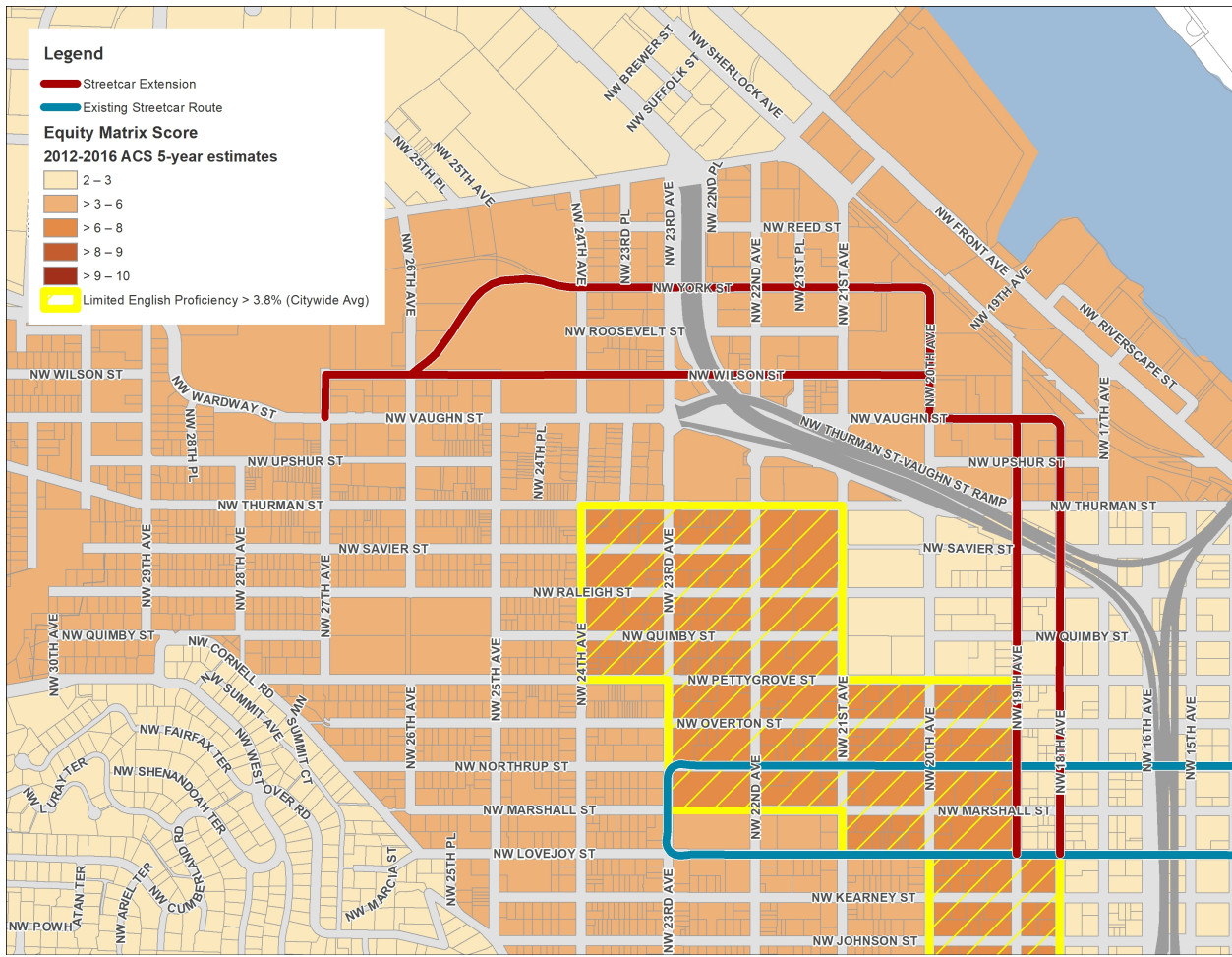


Figure 5. Portland Bureau of Transportation Equity Matrix, U.S. Census Bureau, 2012-2016 5-year ACS estimates.

Opportunity maps show an areas' proximity to multiple public and private community amenities that correlate with better quality of life outcomes. PHB uses this tool to guide the siting of regulated affordable multi-family housing. The study area is considered a "high opportunity" area. Increased housing choices in a "high opportunity" area is policy priority for the City and supports our FHA responsibility to affirmatively further fair housing.

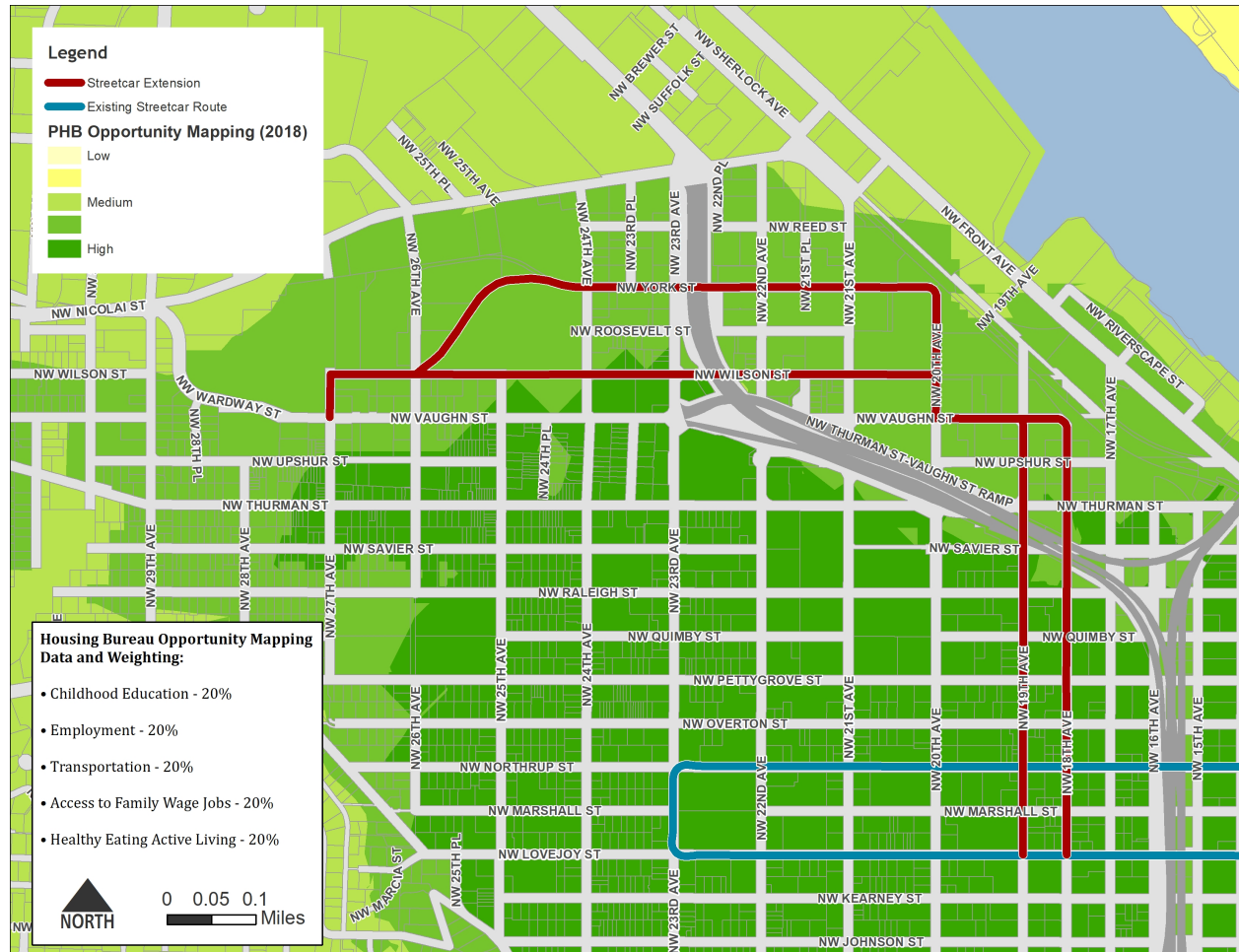


Figure 6. Portland Housing Bureau Opportunity Maps, 2018

Gentrification and displacement risk are highest in neighborhoods with the largest numbers of low-income households of color. Looking at the relationship between housing cost pressures in these areas of the city and the potential housing supply provided in the study area is important as we consider lifting zoning limitations on housing. A closer look at the gentrification typology shows some susceptibility to gentrification in a part of the southern study area. This is driven by the area's proximity to the Pearl District's more active real estate market.

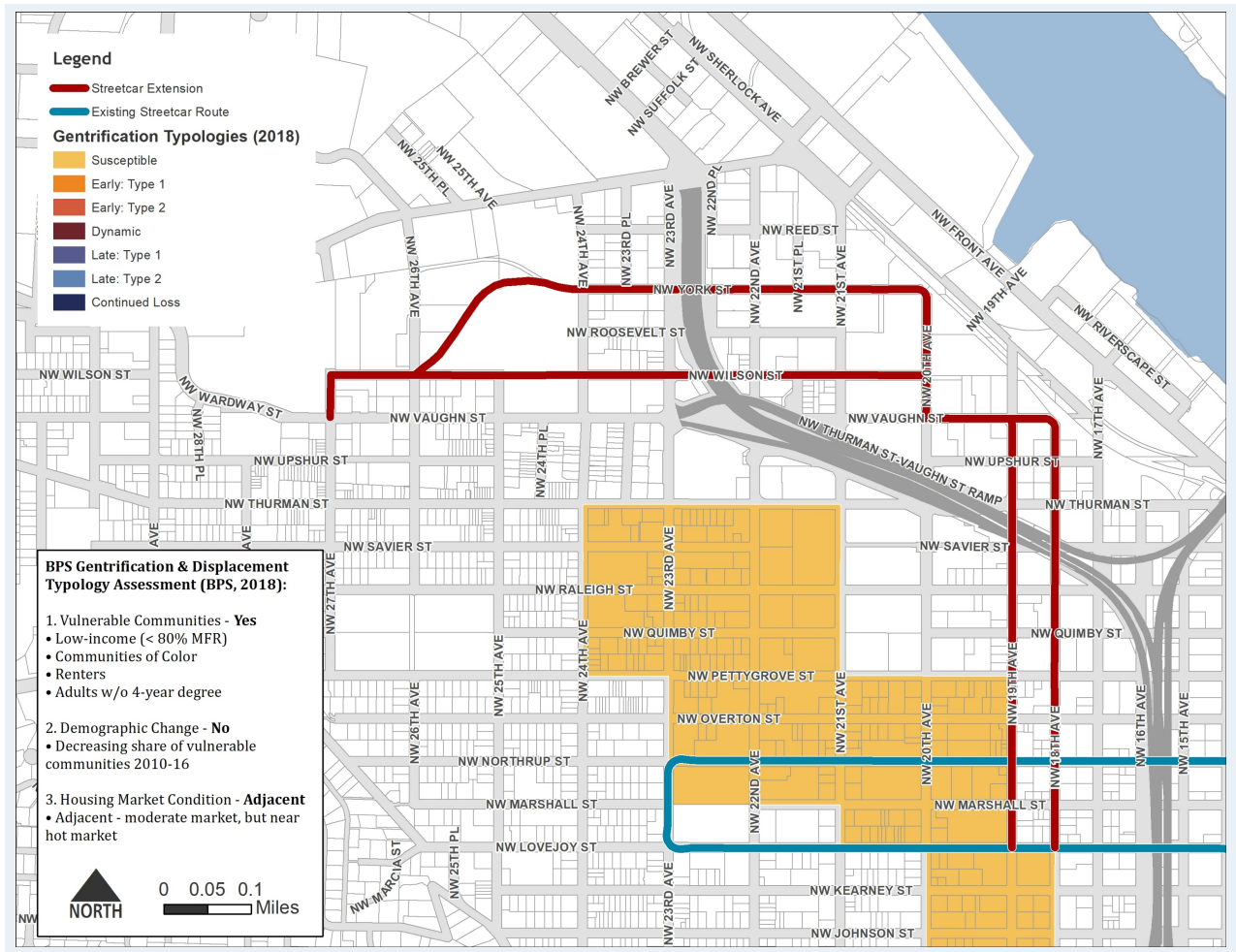


Figure 7. Portland Bureau of Planning and Sustainability Gentrification Typology Maps, 2018.

WHO BENEFITS AND WHO IS BURDENED?

WHICH STRATEGIES MITIGATE BURDENS AND ADVANCE EQUITABLE OUTCOMES?

Below are potential benefits and burdens identified through an analysis of impacts to land value, housing, and jobs by each land use scenario. Strategies to mitigate burdens and enhance benefits are then described. Some impacts were identified by planning tools. Other benefits and burdens were identified by eight equity practitioners from across the City who participated in a series of four work sessions designed to surface issues of systemic and structural racism.

Increasing housing development potential at a cost of losing middle-wage industrial jobs is one outcome we kept coming back to. The self-sufficiency of households of color is determined by both a quality job and an affordable home. A worst-case scenario in which the overall number of self-sufficient households of color is decreased is a real possibility we considered (i.e. more living wage jobs are lost than affordable housing gained).

Past streetcar expansions were central to broader real estate development and neighborhood revitalization efforts. [Urban Renewal Areas](#), [Local Improvement Districts](#), and development agreements were the primary tools to achieve the City's desired public benefits and give developers clarity about what development should accomplish.

Inclusionary Housing requirements and regulations that comply with the American for Disabilities Act are examples of how the zoning code can also be a vehicle for mandating and incentivizing equity-related public benefits. A discussion on mitigation should include all the strategies the city current has available, including a no action option. Consideration of other policies and investments should compliment these tools.

Impacts to land values and uses and equity strategies to explore further

Private economic gains derived from land use changes and public transportation investments are a major incentive for development but will exacerbate existing racial wealth disparities. Some land values would increase 2-5 times due to changing industrial zones to mixed use or higher density employment (see table below). Most land will experience a 3-10% increase from the introduction of streetcar. These benefits will accrue to the current land owners who are predominately if not exclusively white. Development could produce more public benefits because of the land value increase if the City enters into agreements with land owners or regulates the provision of these benefits.

The lift in land values provides the opportunity to create a Local Improvement District which is the primary local funding source for the streetcar construction. This new transit would benefit transit riders who skew toward being lower-income and younger than the general population.

Potential land use changes replace up to 90 acres of industrial land with commercially zoned land.

Industrial land is already in short supply throughout the city and is difficult to replace. Industrial land supports living wage jobs that are disproportionately held by people of color.

Zoning changes would result in more land supply of certain zoning categories that are currently oversupplied citywide and could redirect growth from other parts of the city. There is currently more than a 40-year supply of land zoned for high density residential and commercial uses. The redevelopment of the study area would not increase the overall demand for housing and commercial space region wide. Instead, building out streetcar and making zoning changes would provide another desirable option for real estate development that creates more density near the central city connected by high frequency transit. A coordinated infrastructure project of this scale does encourage more timely and compatible development than ad-hoc city-wide development. One important note, the area is not within an Opportunity Zone so developers may be more inclined to other central city locations.

Land use changes and redevelopment in the study area could place redevelopment pressure on the industrial land to the north. The study area currently provides a buffer to the more traditional industrial uses.

Land value increases by zoning scenarios		
Price per sq. ft. of site area on property sales - January 2015 through August 2017		
Land use types	Median price	Average price
Citywide	\$66	\$82
Scenario 1: Streetcar introduced but current land uses are maintained		
Harbor & Airport Districts, Industrial (I) zones	\$25	\$33
Dispersed Employment Areas, I and EG zones	\$50	\$58
Scenarios 2-3: Introduce streetcar and inner Southeast light industrial type land uses; light industrial, offices, institutional uses		
Central Eastside, IG zones	\$132	\$151
Scenarios 4-5: Introduce streetcar and shift to Pearl District type land uses; mixed-use vertical residential development, office, retail and services		
Town Center	\$131	\$234
<i>Source: BPS calculations from Multnomah County Assessor data.</i>		

Some specific ideas to explore to avoid or mitigate burdens and advance equitable outcomes include:

1. Top Recommendation. Develop incentives and regulations to ensure the economic benefits for people of color are equal to or greater than the private economic benefits accruing to land owners. Through the eligible uses of revenue from a Local Improvement District and/or an equitable development agreement, an increase in land value can be equitably distributed to create economic opportunities such as:

- Minority Business Enterprise contracting requirements in private development and public works
- Job training and career advancement programming
- Low cost capital and technical assistance for POC entrepreneurs
- Below market commercial space for POC business startups and expansions

These economic opportunities could extend or be transferable to existing POC-led community development initiatives such as the nearby Albina Vision.

Best practice: City of Seattle [Equitable Development Agreement framework legislation](#)

2. Establish development standards to make the area the most disability-accessible area in the city. The development code could be written to require universal design standards above the ADA minimums for all public and private development.

Impacts to housing and equity strategies to explore further

Streetcar will provide current residents a new transit option and decreases carbon emissions and improves their air quality. Over 5,000 existing residents in the study area, including 229 households in regulated affordable housing, would benefit from new transit and improved environmental quality. In addition, the over 7,000 households in regulated affordable housing along the full streetcar network would have improved access to the jobs and amenities in the study area.

More housing and affordable housing in a high opportunity area will provide more choices for low-income households of color. Residential development in the study area is forecasted to increase by 3,300 new homes by 2035 under current conditions. Scenario 3 increases those housing development estimates by 1,150 to 4,000 new homes, of which 350 to 950 will be affordable through the current inclusionary housing program requirements. Figure 6 shows the area scores high on the City's Opportunity Index, having many amenities that increase households' economic opportunity and a high quality of life. More affordable housing will diversify the area and create more affordable housing choices citywide.

Affordable Housing

Housing affordability is typically expressed as a measure of housing costs in relation to household income. The standard for housing affordability is housing costs, including basic utilities, that amount to 30 percent or less of a household's gross income.

One caution to note is the potential to replicate the Pearl District development model of providing for some affordable housing but not affordable commercial and culturally relevant services for low-income households and people of color. Engagement with residents of affordable housing in the Pearl District is recommended to understand the social and financial implications of this dynamic.

Housing in the study area will relieve region-wide housing pressures and could relieve pressure in other gentrifying areas. As discussed in the land use impacts above, increased desirability to live in the study area will only redirect development from other parts of the city. Housing development puts downward pressure on housing costs region-wide. It could also redirect real estate investment from areas experiencing gentrification-fueled real estate activity.

Increased desirability could also lead to displacement of existing affordable market housing. However, our analysis identified 64 multi-family apartment buildings in the study area but only three that met the criteria for “affordable market rate”, meaning they have market rate rents currently affordable to lower-income households. This small inventory of affordable apartments is not likely to exist much longer due to rising rents regardless of the land use decisions under consideration.

The most significant challenge this area faces is if demand for affordable housing is not met, racial disparities of housing cost burdened households will be exacerbated. The Northwest district is already a high cost area where the average household of color cannot afford any type of housing according to the [City’s 2018 State of Housing](#) report. To meet the affordable housing needs of the 3,300 to 7,500 new households forecasted under different scenarios would require 1,000-2,500 new regulated affordable homes for households with incomes at or below 60% median family income based on the trends of future household incomes.

Some specific ideas to explore to mitigate burdens and advance equitable outcomes include:

1. **Top Recommendation. Private land owners contribute land to a land bank as part of an equitable development agreement.** Land costs will become prohibitive for mission driven nonprofit development organizations. An increase in land value from transit investments and land use changes can be equitably distributed in the form of land contributions to a holding entity. Land could be assembled and held patiently while nonprofits secure financing to develop affordable housing and community development projects.
2. **Accompany increases in development allowances from rezoning with an enhanced Inclusionary Housing program.** The IH program already exists within the land use code and Comprehensive Plan policy framework. Working with existing tool could more efficiently help private developers produce affordable housing rather than using another vehicle like a development agreement. An enhanced IH program could include:
 - Higher percent of affordable units than current program. Consider a 30% minimum similar to requirements in past streetcar-related development agreements.
 - Minimum percent of all new homes with 2 and 3 bedroom that is higher than what is being developed by the private market in the current real estate cycle.
 - Minimum percent of regulated affordable housing are permanently supportive housing with services.

Best practice: See the affordable housing goals in past urban renewal area plans in the [2017 State of Housing Report \(page 101\)](#)

- 3. Connect housing, jobs, and transit policies and services to help low-income households live near where they work and commute affordably.** This could include adopting a preference policy for income qualified people working in the area to be prioritized when regulated affordable housing becomes available. In addition, those living in regulated affordable housing and/or enrolled in workforce training programs could be automatically enrolled in TriMet's low-income transit pass program.

Impacts to jobs and businesses and equity strategies to explore further

Displacing industrial jobs disproportionately held by people of color and shifting to a job mix of more professional office and retail service industry jobs will exacerbate racial disparities and income inequality. Land uses changes will support redevelopment leading to 530-1,400 middle-wage industrial jobs displaced that do not typically require advanced degrees and are disproportionately held by people of color. The elimination of industrial jobs for employees of color will decrease their economic self-sufficiency and disrupt their housing stability wherever they are living.

Redevelopment in scenarios 2 and 3 is likely to result in a net increase of 1,270-1,380 total jobs in the area but an overall decline in city-wide jobs. The job growth will be driven by high-wage professional office and institutional jobs and low-wage service jobs. As described in the land use impacts above, expanding streetcar and making zoning changes provides another desirable option for real estate development, redirecting those office and retail jobs from other parts of the city.

Could worsen or improve commute times for industrial workers. Industrial workers typically live in East Portland and Vancouver and commute by car. Displacement of their jobs out of NW will change their community patterns as industrial firms relocate.

Streetcar increases transit options for current workers and provides visibility for existing businesses. The 11,400 workers currently in the area would have a new transit option. The existing retail businesses would see a substantial increase in the foot and car traffic in the area. This increased congestion is a burden for industrial businesses and creates an accessibility issue for people with mobility disabilities. As noted above, industrial workers mostly commute by car and do not live in the area so street car does not serve their commuting needs.

Some specific ideas to explore to avoid or mitigate burdens and advance equitable outcomes include:

- 1. Do not rezone industrial land.** Proceed with caution regarding loss of industrial land. There is limited industrial zones here in Portland. While there are potential ways to mitigate the loss of this land, we also know that this site has been preserved as prime because it is difficult to create more of.

If rezoning is considered, then the City's 1:1 existing prime industrial lands replacement policy must be implemented fully and a business relocation program funded before rezoning goes into effect. Equity criteria for where to replace land could include:

- Environmental justice criteria that considers adverse impacts to existing low-income/POC households
- Community capacity to take advantage of industrial economic opportunity
- Brownfield remediation to increase development feasibility for existing polluted industrial land (ex. brownfields in Gateway)
- Proximity to where existing workers live
- Proximity to freight infrastructure
- Availability of municipal golf courses for redevelopment

The city and industrial sector partners could develop a package of incentives, technical assistance, and capital for businesses in the study area to relocate to the replacement area.

2. Design hiring policies to address historical inequities and regional racial disparities in income.

A priority hire policy for the study area could prioritize the training and hiring of workers from high poverty census tracts throughout the city to work on public works projects in the area.

Best practice: [Seattle's Priority Hire Policy and Program](#) prioritizes the hiring of residents that live in economically distressed areas for all large municipal construction projects.

3. Enhance the commercial affordability bonus program to address regional racial disparities in business ownership. Commercial permits could come with a requirement to provide below-market commercial space to incubate a small business.

Best practices: [Oakland's Cannabis Equity Permitting Program](#) prioritizes business permits and free commercial space for Oakland residents who have been the most victimized by the war on drugs.

4. Recruit new employers from sectors that provide living wage jobs for people of color. Regional economic development organizations (no one is doing this) could initiate an employer-type recruitment initiative targeted at employers with jobs that require lower educational attainment but provide good wages and career ladders.

5. Create workforce development/job training programs for people of color. A workforce development agency like Worksystems Inc. or post-secondary institution like Portland Community College could compliment the employer recruitment effort described above by providing tailored educational opportunities to the skills sets required of those jobs.

RECOMMENDATIONS FOR FUTURE PLANNING

Our process identified some key questions to answer and some recommendations as the City and Portland Streetcar move forward.

1. What is the Portland Streetcar’s overall comprehensive racial equity strategy? How does this expansion fit into that?
2. Should the City plan for and fund a streetcar focused anti-displacement community development strategy?
3. As we explore expanding the streetcar network, how can communities of color be centered in the planning?
4. How will we measure and report on our racial equity goals? How are we accountable?

City and Portland Streetcar team recommendations

1. **Top Recommendation. Allocate a significant portion of the Federal Transit Administration TOD Grant budget for best practices in equitable planning.** Resources for community engagement and development of an implementation plan for mitigation/equity strategies is clear indication of the team’s commitment to doing things differently from past transit planning projects. The 2011 HUD/FTA Sustainable Communities Grant program required 10% of all grant funds be used for community engagement. Metro’s most recent FTA TOD grant allocated over 25% of its \$1 million budget toward community engagement and anti-displacement planning.
2. **Develop a Portland Streetcar Inc. organizational racial equity strategy.** PSI should hire an equity consultant to work with their board and community partners to answer the question “how does streetcar contribute toward the City’s racial equity goals?” A number of local and national firms exist to help organizations like PSI do this work. Metro contracted with the Government Alliance on Race and Equity to develop their Diversity Equity and Inclusion Strategic Plan. Prosper Portland contracted with PolicyLink to develop their most recent strategic plan.
3. **Use the City’s Racial Equity Toolkit to decide whether or not to expand streetcar into Northwest given the transit and economic development needs in other parts of the city.**
4. **Create a role for the Office of Equity and Human Rights on the project team.** OEHR’s budget equity tool, Racial Equity Toolkit, and Equity 101 training are all resources to help the project team use equitable practices and support the first recommendation above.

Community engagement recommendations

1. **Top Recommendation. Engage workers and firms in the planning process.** The worker profiles and assumptions used in this analysis need to be ground truthed with that actual workers and firms in the study area. Our recommendations should be vetted and supported by these stakeholders before any further work is done to advance them to implementation.
2. **Engage residents of affordable housing in the Pearl about their experience.** These residents have experienced living in affordable housing in a mixed-income neighborhood lacking affordable ecommercial and cultural services. This perspective is relevant to Scenario 3.
3. **Resource community-based-organizations involved in housing/transit/land use agendas to do engagement and community-based research.** Through the FTA grant funding, CBOs should be funded to engage low-income residents and people of color in the planning process. Ensuring their voices are heard in the process will lend support to the final products. Ensuring their priorities are centered in the final plans is critical to actually reducing disparities.

CBOs engagement during the planning process could also provide an opportunity to educate existing residents on their rights under existing and new local and state landlord/tenant laws

4. **Initiate a dialogue with investors and land owners about the City's racial equity work.** The City's equity goals and the tools to achieve them (incentives and mandates) should be clearly communicated to these stakeholders. A conversation about how they can contribute to the solution to ending racial disparities should occur during the next phase of planning.

APPENDIX 1: RELEVANT COMPREHENSIVE PLAN POLICIES

CHAPTER 3 - Urban Form	
Goal 3.A: A city designed for people	Built environment promotes prosperity, health, equity and resiliency; Development and investments reduce disparities.
Policy 3.3: Equitable development	Development reduces disparities; mitigate impacts of development on income disparity, displacement and housing affordability.
3.3.a	Anticipate, avoid, reduce, mitigate public facility and development impacts.
3.3.b	Accompany needed investments with proactive anti-displacement and affordable housing measures.
3.3.c	Community benefit agreements, plans and incentives to promote equitable outcomes from development that receives public assistance.
3.3.d	Use Zoning Code to provide community benefits as a condition for projects to receive increased development allowances.
3.3.e	When plans and investments increase private property values, require mitigation of displacement and housing affordability impacts.
3.3.g	Community Benefits Agreements: Encourage developers to engage with impacted communities to provide benefits and mitigate impacts.
Policy 3.9: Growth and development	Evaluate displacement and housing affordability impacts of planning, public investment, infrastructure and development. Mitigate anticipated impacts.
CHAPTER 5 - Housing	
Policy 5.10: Coordinate with fair housing programs	Affirmatively further fair housing.
Policy 5.12: Impact analysis	Evaluate plans, investments, infrastructure and development for impacts on housing choice and affordability. Mitigate anticipated impacts.
Policy 5.15: Gentrification/displacement risk	Evaluate plans, investments, infrastructure and development for impacts on housing costs and potential to cause gentrification/displacement. Mitigate anticipated impacts.
Policy 5.16: Involuntary displacement	Limit displacement caused by plans, investments, infrastructure and development. Create permanently affordable housing and mitigate market-based displacement pressures.

Policy 5.17: Land banking	Hold land in reserve for affordable housing and community development.
Policy 5.18: Rebuild communities	Enable communities impacted by displacement to maintain social and cultural connections, and re-establish a stable presence in impacted neighborhoods.
Policy 5.29: Permanently affordable housing	Increase supply of permanently affordable homes.
Policy 5.30: Housing cost burden	Evaluate plans and investments for their impact on household cost.
Policy 5.31: Household prosperity	Provide low-income households with greater access to transit, education and employment.
Policy 5.35: Inclusionary housing	Use regulatory tools to create affordable units in market-rate developments.
CHAPTER 6 - Economic development	
Policy 6.27: Income self-sufficiency	Expand access to self-sufficient wage levels and career ladders for low-income people.
6.27.a.	Support industrial districts as a leading source of middle-wage jobs that do not require a 4-year college degree.
6.27.b.	Evaluate and limit negative impacts on middle and high wage jobs.
Policy 6.30: Disparity reduction	Encourage investment in efforts to reduce disparities in income and employment opportunity.
Policy 6.31: Minority-owned, woman-owned and emerging small business (MWESB) assistance	Improve access to contracting opportunities.
CHAPTER 8 - Public facilities and services	
Policy 8.32: Community benefits	Provide community benefits with large public facility projects.