



April 7, 2024

Bureau of Planning and Sustainability  
1810 SW Fifth Avenue  
Suite 710  
Portland, OR 97201

RE: Housing Production Strategy Action Plan, Discussion Draft

Thank you for the opportunity to comment on the Bureau's Housing Production Strategy Action Plan. We have appreciated the focus of state legislators and other decision makers on equity, as well as the explicit inclusion of people with disabilities as a vulnerable community that faces housing inequities. We recognize that several decades of wholesale institutionalization of people with disabilities in the 20<sup>th</sup> century severely limited the disability community's participation in decisions about housing that meets their needs. We are hopeful that the renewed attention to the need for accessible housing will dramatically ease the housing crisis for people with disabilities.

People with disabilities face unique challenges in the housing crisis:

- Employment discrimination and limited opportunities often mean people with disabilities are extremely low income (<30% of AMI).
- There is no accounting of accessible dwelling units, so we have no way of knowing where those units exist.
- Widespread noncompliance with regulations to build accessible units in multifamily housing has resulted in a severe shortage.
- Single-family homes, which account for two-thirds of the housing stock, are largely exempt from accessibility requirements.
- And the number and percentage of fair housing complaints based on disability continue to rise, presently accounting for 60% of complaints, and people with disabilities are routinely denied accommodations that enable them to fully enjoy their homes.

With these pervasive and overlapping issues in mind, we would like to express our concern about the scope and potential of the action plan's proposed strategies to meet the housing needs of people with disabilities.

To do so, the City needs housing at the lowest level of affordability that also meets Universal Federal Accessibility Standards (UFAS). To account for past noncompliance and the growing older adult population, state and local government should increase the required percentage of UFAS-compliant dwelling units. In addition, state and local agencies should work with housing providers to assess all existing multifamily housing to determine where dwelling units have accessibility features and provide this information to the public.

The following is responsive to each instance where disability is mentioned in the action plan:

**A7. Incorporate Affirmatively Furthering Fair Housing Into City Code:** We appreciate the intention to consider additional fair housing requirements for developments in locations with high concentrations of vulnerable groups. This could promote integration for people with disabilities and older adults, groups that routinely face segregation.

**C1. Study Multi-dwelling Zoning Changes in Inner Centers & Corridors:** This study would support the proposals of the Aging- and Disability-Inclusive Neighborhoods Project regarding service hubs located in centers with convenient transportation.

**C2. Study Zoning Bonuses and Incentives:** We support the creation of incentives for housing providers who create more accessible dwelling units than required under Section 504 of the Rehabilitation Act and Oregon Specialty Structural Code. Upon completion, dwelling units built with incentives should be inspected for compliance.

**E. Additional Ideas For Consideration:** The 1915 state plan options and 1115 Demonstration program could be helpful to support people with disabilities to receive housing navigation support, relieving some of the burden of finding affordable, accessible housing. The 1115 program can also pay for short-term rent assistance. In Oregon, the state already covers case management and in-home supports for many people with disabilities. These services tied to housing developments may be unnecessary for this population.

**F1. Explore Accessible Housing Production Strategies:** Though each bullet point under this proposed strategy is necessary to support people with disabilities to know where accessible housing exists and regulate its production in the future, it is unclear how these steps will “reduce... barriers to developing needed accessible housing.”

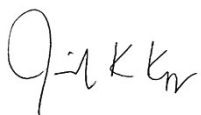
**F2. Educate on Opportunities for Aging in Place & Community:** Retrofitting inaccessible single-family homes incrementally is a long-term strategy, the benefits of which will likely not be apparent for several years. It is dependent on homeowners’ forethought of their needs to age in place and their ability to pay for upgrades.

As a whole, the action plan could do more to address the immediate housing needs of people with disabilities. The disability community needs more housing that is both affordable and accessible. Incentives and better regulation are useful, yet as a matter of equity, we are hopeful that the final version of the action plan takes a bolder approach to serving people with disabilities.

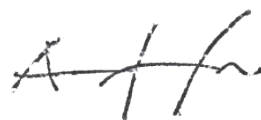
We understand that planning for the next 20 years is a big undertaking, and we would be happy to provide more context to the problems the disability community faces and ways to address these problems.

Thank you for your consideration.

Sincerely,



Jennifer Knapp, Executive Director



Allen Hines, Housing Access Director