



Portland Housing Bureau

To: Barry Manning, Senior Planner

From: Jessica Conner, Senior Policy and Planning Coordinator

Cc: Matthew Tschabold, Policy and Planning Manager

Date: May 6, 2021

Re: Housing Bureau Comments on Montgomery Park to Hollywood In-house Draft

The Housing Bureau appreciates the opportunity to review and comment on the Montgomery Park to Hollywood (MP2H)'s NW Portland study area In-house draft and offer the following comments and questions for consideration.

The Bureau of Planning and Sustainability's In-house draft of MP2H's NW Portland study area for a streetcar extension is informative yet incomplete, as drafts tend to be. There are several opportunities to clarify meaning and intent, tie policies and goals together, and perform several needed analyses.

All page numbers referenced are from Adobe in the tool bar and not on the document itself.

Volume 1

Page	In-House Draft	PHB Comments
6	Jessica Connor	Jessica Conner
6	OEHR (invited) – TBD	What is the status of OEHR's participation in this project?
9	Project purpose paragraph	Define what is meant by equitable development in the project purpose so that there is a shared understanding at what is intended.
Multiple; examples on 9 & 10	Multiple references to "streetcar or other high-quality transit service" and "different transit"	The first few pages of the draft reference streetcar and other transit options, but I do not see other transit options included in the development scenarios and I do not see the rationale in the draft of any decisions made as to why these other options were not included and streetcar was seen as the best option. Include this rationale for clarity and transparency. Without this information I am very hesitant to offer a fully formed opinion or position. If the information exists elsewhere then making that connection would be great. Because if streetcar has always been the option, then remove reference to "other options" because this statement is then misleading.
13	Second paragraph. Existing conditions report does not include analysis for the preferred alignment.	That the existing conditions report analysis is cited throughout this document and yet does not include analysis of the preferred alignment option and is highly problematic. This means that all subsequent data presented is not accurate and does not represent the path that

		this project wants to take. I would not recommend that PHB take a position on a policy or program where data is available and not used. Once publically available, the community will certainly notice this as well.
14 – 15	Demographics and equity indicators	Considering the current climate of racial and social justice, housing affordability, and economic inequality, proposing a project in an area with low poverty, higher white population, and higher median incomes than the city as a whole, there should be a more apparent rationale about why this project should happen in this neighborhood at this particular time and who benefits.
15	Commute data	I am not clear on what this data is or should be telling us and I don't see the connection anywhere in the narrative. Are these folks travelling in, out, or through the area? But then again, this might be found in other related reports so finding a way to tie it in would be helpful.
22	Transit classifications and map	As a novice I could use some help understanding this piece: If frequent transit service to Montgomery Park is the goal, then why wouldn't we make the 15 and 77 frequent lines? The NW portion of Line 15 is already a frequent transit line with the portion beyond Thurman as standard service. The report also does not describe the impact to the #15 if the street car also runs on NW 23 rd . The 77 also runs standard service and right through Montgomery Park. Maybe these are in here, but calling them out for the lay person would be really helpful in understanding impacts and the rationale for decision making.
26	Goal 2B and Policy 2.3	Draft is not clear on how it meets this Comp Plan goal and policy.
27	Policy 3.3 and 3.9 – mitigating impacts	The affordable housing bonus and additional IH bonus options and affordable commercial options seem like the mitigating impact actions for this plan. It is unclear at this time if the bonuses offered match the anticipated impacts. BPS has acknowledge the need for this analysis and PHB would like to review this analysis before weighing in.
28	Housing Policies 5.12 and 5.15	I do not see the analyses for these two policies. Please provide so that PHB can use these in considering this project.
29	Transportation Policy 9.25 – Transit Equity...improve service to areas with high concentrations of poverty and historically under-served and under-represented communities.	Clarify how this project aligns with this transportation policy considering the data that has been presented so far.

31	NW Streetcar Preliminary Racial Equity Analysis	The preliminary racial equity analysis and the subsequent challenges and recommendations provided only includes those for the original study area and does not include analysis for the preferred alignment option. The paragraph does not mention this and reads as misleading. Please amend the paragraph with this notation. Recommend that a new racial equity analysis and data analysis be performed that includes the entire study area with the preferred alignment option prior to public release and so the bureau may use this in considering its position.
33	Community based organization outreach	The report data shows that 70% of the residents in the original study area are renters but this stakeholder group does not seem to be represented in either the project working group or the CBO outreach groups. Identify how this demographic was included in the engagement and outreach efforts.
65	Planned Developments – sites need to be over 5 acres	In order to take advantage of an affordable housing bonus, a planned development site needs to be at least 5 acres. How many parcels in the area are over 5 acres with current zoning or proposed zoning that would allow the possibility of a planned development?
65	D-overlay and DOZA applicability	Just a flag for bureaus that based on this section any option with a land dedication will likely get a d-overlay designation.
69	H2 – create over 300 affordable housing units in Plan District through IH	Change this number to be a range of potential units. This number is assuming that based on what is possible under the land use scenario that the most IH units that can be built, will be built. It does not take in to account projects that do not build to the max and it does not take in to account projects that will use reconfiguration which results in a lower number of units overall. Also IH projects can send off-site and so units produced won't necessarily end up in the area. Unless this limitation will be built in to the plan district guidelines. If that is the case, PHB will want to review that as well.

Volume 2

Page	In-House Draft	PHB Comments
74	Jessica Connor	Jessica Conner
74	OEHR (invited) – TBD	What is the status of OEHR's participation in this project?
113	IH bonus –supplemental to base IH	1. Half the of the plan district is overlayed by the historic alphabet district. How will the ability to have additional height play in to feasibility?

		<p>2. Sections 1.a. and b. should include a reference to the Housing Bureau as the program administrator so that we can be clear that this additional % of units will use the standard IH program requirements.</p> <p>3. For 1.a. Is 5% the right percentage? What does the feasibility for other numbers look like? Is 10 feet the right amount? What does the feasibility look like? How about for different heights?</p> <p>4. Same questions for 1.b. BPS has acknowledge the need for this analysis as well and we support that.</p>
115	Planned Developments	<p>Same questions about PDs mentioned earlier: In order to take advantage of an affordable housing bonus, a planned development site needs to be at least 5 acres and not located in a historic district. How many parcels in the area are not in the Alphabet District, over 5 acres with current zoning or proposed zoning that would allow the possibility of a planned development? What is the potential these parcels will take the PD path and not something else?</p>
115	Planned Developments	<p>Am I reading this right: PD's that use this bonus option get additional 65 feet of height?</p>
115	Subdistrict B – IH bonus 2.a.	<p>1. If allowed to provide IH units off-site, does this include providing them outside of the plan district? If so, then this would ultimately lower the number of affordable units projected for the area in the plan.</p> <p>2. Support not allowing a fee-in-lieu for this bonus, but I imagine we will get push back.</p> <p>3. How does the additional FAR fit in to the feasibility of a project within their overall allowances?</p>
115	Subdistrict B – IH bonus 2.b.	<p>1. I'm confused. 2.a. just said you can't pay a fee in lieu to get additional square footage for commercial use but 2.b. says you can buy it. What am I missing?</p> <p>2. Supportive of payments in to the affordable housing fund for commercial uses, but interested to hear Prosper's thoughts.</p>
129	Planned Development Requirements – B. Affordable housing	<p>Section should clarify when in the process this letter is required. We've had a few issues in the past with the timing of these letters, so we would just want to get it right at the outset.</p>