

**DISCUSSION DRAFT FOR IE PEG REVIEW**

**Memo**

To: Comprehensive Plan Management Team

From: Infrastructure Equity Policy Expert Group staff team: Andrée Tremoulet (Commonworks Consulting), Bob Glascock, Michele Crim, Michelle Kunec-North

Subject: Feedback from the Infrastructure Equity PEG

Date: XXXXXXX, 2013

The purpose of this memo is to present advice to the staff preparing the next draft of the Comprehensive Plan Update (CPU) regarding ways to strengthen how Infrastructure Equity is addressed.

The Portland Plan identified equity as one of four shared priorities to guide the City's actions over the next 25 years. One of the principal ways that City government can make progress in this area is to fully consider the equity implications of investments in public infrastructure. As the City's plan to guide growth and investment for the next 20 years, the Comprehensive Plan must provide a sturdy framework for ensuring that all Portlanders equitably share in the benefits and burdens of growth and development.

This memo summarizes the principal themes discussed through April 2013 by the Infrastructure Equity Policy Expert Group (IE PEG) on the Working Draft (January 2013) of Part 1 of the CPU. Initial meetings (June and July 2012) were spent learning about the City's infrastructure systems and developing a better understanding of the concepts of infrastructure equity, unintended consequences, gentrification and level of service disparities. Once the Working Draft Part 1 was available, the IE PEG focused on reviewing Section III (Goals and Policies), especially Chapters 6 (Public Facilities and Services) and 7 (Transportation).

In an effort to provide information to staff in a way that is clear and actionable, this memo presents ten key themes to guide revisions to the Discussion Draft. The themes can be used as lenses to review chapters, goals and policies. In some instances, specific recommendations for changes are suggested. In other cases, staff should use the themes as touchstones to prompt and weigh potential changes to the document.

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The Addendum presents additional IE PEG feedback captured in meeting notes, surveys and work session exercises. It is the raw data from which the themes were developed, and, as such, it includes a higher level of detail than the thematic presentation.

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Feedback from the Infrastructure Equity Policy Expert Group  
For the Comprehensive Plan Update  
Draft June 2013

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**Infrastructure Equity** means the decisions about infrastructure investments are fair, and the benefits and burdens are shared by *all* Portlanders. Infrastructure equity requires asking key questions about who benefits, who pays, who decides and what the unintended consequences may be. Infrastructure equity means prioritizing infrastructure investment decisions that ensure low-income communities, communities of color, and people with disabilities have access to the same infrastructure services as everyone else.

The IE PEG found that *equity* is not the same as equal or identical; equity is best achieved through using flexible standards appropriate to the context and the community. In Portland, communities of color, low-income communities and people with disabilities have experienced long standing disparities that affect the current distribution of benefits and burdens; in delivering services through infrastructure, the City is not starting from a level playing field and should address this in the Comprehensive Plan Update (CPU).

The IE PEG offers ten themes and several recommendations on Working Draft Part 1 of the CPU.

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1. **Everyone deserves a basic level of service.** Infrastructure (or lack thereof) has far reaching impacts in determining the social, health and economic outcomes of a community. The first step in attaining infrastructure equity is ensuring that all Portlanders have access to basic levels of service for key service levels.

What is meant by “basic level of service” needs to be established, with public input, for the key services a bureau provides; the standard should not be set too low. A number of factors should be considered, including industry standards, health and safety concerns, community preferences, and the impacts of the cost of services. Basic levels of service should be mapped to identify gaps and analyze the distribution of benefits and burdens. Finally, bureaus should identify barriers to providing a basic level of service to all Portlanders and strategies to address them. To the extent possible, the CPU should establish a policy framework to facilitate this work.

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The CPU should acknowledge that providing everyone with a basic level of service may result in different strategies for different bureaus, depending on current conditions and the availability of funding to address disparities. Some services, such as transportation, appear to have significant disparities in the levels of service. For bureaus with big service disparities, the primary infrastructure equity goal might be to provide a basic level of service to all Portlanders.

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For other bureaus, challenges to achieving infrastructure equity lie principally in maintaining existing levels of service and addressing the distribution of burdens, particularly costs. For all bureaus, infrastructure equity extends to operations and maintenance; the benefits and burdens of maintaining infrastructure should be shared by all Portlanders.

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The IE PEG recognizes the dynamic nature of neighborhoods, with shifting demographics and cycles of private investment/disinvestment/re-investment. Ownership of public assets (such as parks) endures, but populations and prosperity can shift from place to place over time. Infrastructure equity considers both current and future disparities in levels of service.

In making investments, the IE PEG explored the idea that bureaus should consider the functional ability of different communities to “work around” service disparities, as well as manage or recover from service disruptions. Given this, consideration should be given to alleviating service disparities for more vulnerable populations – including low-income communities, communities of color and people with disabilities. The Bureau of Environmental Services should prioritize investments in the sanitary and stormwater systems to reduce basement sewer backups and flooding in communities that are less able to recover from such an event. And, the Portland Bureau of Transportation should prioritize investments in sidewalks or bike lanes to serve communities that are more reliant on transit or other non-automobile forms of travel.

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#### Some Recommendations:

- Providing a basic level of service for everyone should be a fundamental guiding principle for infrastructure investments.
  - In particular, investments should prioritize addressing long-standing disparities and service gaps for communities of color, low-income communities and people with disabilities.
  - Similarly, investments to provide a basic level of service should be prioritized above enhancements to basic services (e.g. invest in building out the bike network before enhancing existing bike lanes).
  - Bureaus should engage in a public process to define basic service levels – including mapping of service gaps, analyzing impacts on communities of color and low income populations, identifying barriers to providing a basic level of service for all Portlanders and recommending strategies to overcome those barriers.
  - Decision-makers should weigh both the needs and priorities of specific communities and the community as a whole in making investments and other infrastructure choices.
    - Restate Goal 6.A to read “basic” levels of service (replacing “optimal”). Optimal service levels are not achievable because they are too expensive to achieve citywide. It would be better to frame goals in terms of minimum levels of service that should be provided to all Portlanders.
    - Goal 6.A also seems to assume that system needs align with community-specific goals. What happens when infrastructure system needs and community priorities are not in sync?
  - Neglecting maintenance of existing systems can result in future service disparities. The importance of investing in maintenance needs should be more prominent.
  - The CPU should recognize the role of private development activities in implementing service provisions.
  - Flexible standards and other solutions are needed to address how standards for one service (i.e., storm water) can impede the ability to provide others (e.g., transportation).
2. **Infrastructure investment decisions should be reviewed and considered through an equity lens.** The IE PEG advocates for the use of an equity lens (e.g., questions related to who benefits, who is burdened, who pays, who decides, etc.) throughout infrastructure related decision-making processes.

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The IE PEG recognizes the limitations of the Comprehensive Plan in terms of its impacts. In particular, the IE PEG recognizes that, while the Comprehensive Plan provides the guidance (goals, policies) for decision-making, it does not – in and of itself – prescribe the answers to decisions or ensure if/when/how decisions will be implemented. The CPU is not a simple or singular solution. There is a need for much more systemic change.

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The IE PEG strongly encourages improvements to the CPU that would better enable the subsequent integration of equity considerations in other infrastructure decisions - from goal setting, to project identification and prioritization, to budgeting and construction.

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**Some Recommendations:**

- Review goals and policies to ensure clarity about when and how infrastructure equity needs to be factored into decision making, including its place among other factors (e.g. reducing risk, system capacity needs, etc.).
- Review the action verbs listed in the Appendix, and update the verbs used in the policies as needed to indicate intention and priority level for considering the equity implications of infrastructure decisions.
- The CPU should acknowledge (possibly in the commentary) that the City and partner agencies are developing the capacity to apply an equity lens (or similar tools) to decision making. As written, draft policies imply that the city is currently capable of making equitable decisions instead of acknowledging that it is a learning process. This should be addressed.
- The expectations around infrastructure equity should be clearly articulated in the CPU, to ensure that those goals and priorities are carried through to implementation – including, but not limited to, annual and CIP budget processes.
- In the implementation phase, staff should consider how best to make functional ties between the CPU and all aspects of infrastructure decision-making (even those that are not beholden to the Comprehensive Plan). Goals and policies should be reviewed with an eye toward better enabling this to happen.
- Additional data and maps are needed to better integrate equity into infrastructure decision-making. This information should be provided in Part 2 of the CPU. In particular, existing demographic data about geographic concentrations of populations of color and low-income households should be applied to maps that show levels of service and gaps in service. And, schools and other non-city infrastructure systems should be mapped in the Part 2 analysis. The City should update this information periodically and also strive to improve the information that is used to evaluate equitable levels of service in the future.

**3. Equity should be incorporated more intentionally and consistently throughout the CPU.**

The IE PEG found that intentional choices should be made about where and how to make equity considerations explicit in the language of the CPU. Currently, equity is unevenly mentioned in the goals, policies and sub-policies throughout the document. Equity should be both an overarching goal and also incorporated thoughtfully and consistently in all the goals and policies.

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An example of the problems that arise with the current unevenness can be found by comparing a Transportation Policy with a Public Safety Policy. Transportation Policy 7.24 Project Prioritization does not mention equity, but it should. In contrast, Public Safety Policy 6.74a Community Policing recommends a focus on building relationships with historically underserved

communities. Although proactive actions are required to ensure that the needs of populations that have had a history of negative interactions with the city are met, this policy, as written, may be interpreted as discriminatory.

**Some recommendations:**

- Equity should be both an overarching goal and incorporated more intentionally throughout all of the goals and policies.
  - Consideration should be given to not presenting Equity as one of the integrating goals in Section 1, but instead, as the overarching framework for integrating all the goals – similar to the structure of the Portland Plan. For example, prosperity should be available equitably; education should be available equitably, and so forth.
  - The CPU should be reviewed and revised to ensure that equity is incorporated consistently and intentionally throughout the goals and policies.
- In Section 1, consider addressing infrastructure equity as a government function by discussing access to public facilities and services (the things that municipal government can actually provide) instead of access to opportunity (a vaguer term with less accountability).
- Somewhere in the plan, describe the current barriers to access (e.g., availability of services, funding, language, fit between services and individual abilities, cultural fit, awareness/knowledge of services, proximity/transportation access to services) and include goals and/or policies to address these barriers.
- In the Appendix, provide definitions for additional terms related to equity, such as equitable, equitably, environmental justice, accessible, accessibility, gentrification, displacement, access to opportunity, community values, economic vitality (reframe it so that it gets beyond profits to addressing access to opportunity and services for all Portlanders), quality of life, underserved/under-represented populations.
- Chapter 5: Urban Design and Development mentions equity in Goal 5A and in policy 5.17, which is related to centers, but equity does not appear to be consistently incorporated throughout.
- As an equity consideration, physical accessibility should be integrated into Policies 6.64-6.67 (Park Improvements, Trails System, Natural Areas and Community Centers) instead of through a separate policy (6.69 Special Recreational Facilities). It should also be integrated into Policy 6.81 (Public Safety/Emergency Response in City Facilities). Universal design should be incorporated wherever possible.

4. **Authentic involvement and integration of the whole community in the entire spectrum of activities leading to infrastructure investments is important.** Infrastructure decision-making processes should be transparent and ensure that everyone can contribute, most especially historically underrepresented communities and those in the community that will be impacted by the decisions.

The *spectrum of activities* leading to infrastructure investments includes needs assessment, goal formation, identification and prioritization of projects, funding decisions, project design, project construction and monitoring. In particular, people who are affected should be involved. If significant segments of the community are not involved, unintended consequences may be more likely to go unidentified and unmitigated.

The involvement of the local community early in the scoping process for a project can help ensure more equitable distribution of benefits (including economic development) and more

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effective mitigation of gentrification, involuntary displacement and other potentially negative consequences of infrastructure investments.

The greatest challenge is to authentically engage historically under-represented groups and those that have experienced systemic barriers to involvement in traditional public participation activities. If they are not involved, the resulting project may not meet the varied needs of the communities that cannot participate.

**Some Recommendations:**

- Ensure there are clear connections between CPU chapters – public facilities and services (#6), transportation (#7) and community involvement (#1) – to better ensure that everyone in the community is able to fully participate in infrastructure investment decisions.
- Ensure that the community has important background data that enable them to consider infrastructure equity issues when they participate in infrastructure investment decisions (e.g., maps showing gaps/deficiencies in service relative to the locations of concentrations of populations of color and low income populations). Chapter 1 (possibly Policy 1.10) should be expanded to include this focus.
- Chapters 6 and 7 should acknowledge the value of public participation in producing better projects. Residents know their neighborhoods and districts better than anyone. Widespread dissemination of data enables useful peer review and opens the door to different philosophies, analyses and strategies.
- Project design should involve proactive communication with persons with disabilities. It is particularly important to consult with this community and the Portland Commission on Disability early during the design phase, as this is typically when adaptations can be made in the most cost-effective manner. Draft goals and policies should be reviewed to incorporate this perspective, particularly for transportation infrastructure.

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5. **The CPU should more clearly address how the costs of infrastructure development and operation will be shared, and the affordability implications of those services.** The mechanisms to cover the costs of infrastructure investments should be fair, and should not disproportionately burden those with lower incomes.

In terms of infrastructure equity, the primary challenge is addressing “who” and “how” to pay for the costs to 1) build infrastructure where we have disparities, and 2) operate and maintain infrastructure services on an ongoing basis in a manner that ensures affordability and fairness. Affordability of services, and trade-offs between affordability and levels of service, is a key issue that should be addressed more clearly in the CPU. The community’s ability and willingness to pay for services should be considered when infrastructure decisions are being made.

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The whole community (not just individuals) benefit when everyone has access to an acceptable level of basic services, such as good streets and sidewalks, nearby parks and access to regional trails and natural areas. Services with funding mechanisms that spread the costs of basic services among all Portlanders (e.g., water and sewer) appear to have fewer major disparities than services where the costs are localized (e.g., Local Improvement Districts for streets and sidewalks.) Thus, there appears to be an argument in support of funding mechanisms that share the cost of creating and maintaining a basic level of service among all Portlanders. One example of how to move in this direction is to create a transportation maintenance fee in Portland that would provide a basic level of service to all Portlanders.

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The CPU should also address how to prevent new disparities and unintended consequences of funding decisions. For example, basic maintenance and basic improvements should not be diverted to pay for new projects if this will result in new disparities when existing improvements fall into disrepair.

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In cases where sufficient funding is not available to provide a basic level of service to all Portlanders, a cost-benefit analysis that considers social, environmental and economic factors within an equity framework should be used to establish priorities. The community should have an opportunity to consider both long-term, expensive fixes and more immediate incremental steps toward providing a basic level of service in financially constrained times. Life cycle costs should be considered in this analysis, as well as the need to invest in repair and replacement options to maintain existing service levels over time.

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**Some recommendations:**

- Be consistent in addressing how the costs of services will be covered. In general, the CPU does not provide enough guidance on this topic. It is integral to infrastructure equity, because the cost of services is one of the principal burdens of development.
- The long-term equity considerations of the cost of infrastructure—both initial investments and ongoing maintenance—should be considered in the early stages of project development. Equity considerations include both how costs will be shared among all Portlanders and the ability of lower-income households to pay.
- The costs of basic services should be shared citywide, and individual users should pay for higher levels of service. This may mean reconsidering the current funding models used to support various types of infrastructure.
- Provide financial assistance for those who cannot fully afford to pay for basic levels of service.
- Explore ways to reduce the property owner cost of financing local street improvements, including localized street design solutions (such as PBOT's Street-by-Street Initiative).
- Evaluate opportunities to ensure the CPU creates the policy framework to encourage public-private partnerships as a way to fund new development and major upgrades.
- Be more intentional in where cost recovery is mentioned. Currently, it is mentioned for some services but not others.

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6. **The CPU should more explicitly address how to identify and mitigate the risks of gentrification, involuntary displacement and other negative consequences of infrastructure investments.** The IE PEG is concerned that infrastructure investments (both large and small projects) can impact property values in ways that price out some local residents and businesses.

The IE PEG found that, in the past, some public investments were targeted to physically renew neighborhoods, with little regard to the needs of longstanding residents and businesses and the impacts of those investments. The IE PEG found that public investments need to consider the spatial structure of class and income and that the City needs to learn from the past to build a more equitable future.

Let's consider how and who pays for infrastructure may impact patterns of disinvestment and gentrification in the future. Typically, property owners form Local Improvement Districts (LID's) to improve or pave local streets. The LID process is not affordable for many property owners,

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Likewise, landlords may raise rents (passing along LID assessment to renters). This may result in involuntary displacement of neighborhood residents with lower incomes. Actions should be taken to mitigate these consequences.

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The IE PEG was pleased with the initial work being done to identify neighborhoods and communities at risk of displacement. However, the CPU goals and policies are not explicit with respect to expectations for identifying and mitigating that risk in conjunction with infrastructure investment decisions. For example, policy guidance is missing that ensures projects engage local communities (residents, businesses and property owners) early in infrastructure investment and decision processes, evaluate for potential displacement effects, and utilize a suite of mitigation tools, policies and approaches tailored to the specific neighborhood, businesses and populations at risk.

Potential tools include affordable/mixed income housing, residential and commercial rent stabilization, business assistance programs, and inclusionary zoning. Because of its importance in addressing the displacement effects of infrastructure improvements, the City of Portland should vigorously support the removal of the prohibition of inclusionary zoning in favor of local control.

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#### Some recommendations:

- Consider opportunities to strengthen or expand the existing gentrification related goals and policies in the CPU (housing and economic development chapters).
- Evaluate the need to include additional gentrification related goals and/or policies in the 1) infrastructure related chapters (#6, public facilities and services, and transportation chapters) and 2) the community involvement chapter.
- For situations where significant land use or investment decisions are being considered in areas identified as at risk for displacement of residents or businesses -- add policy language to the CPU directing City bureaus to conduct a deeper analysis of potential gentrification outcomes and mitigation strategies early in the process. Steps of this analysis might include; assessing the potential of displacement of residents and businesses, engaging the community early, preparing a community-specific strategy, and monitoring outcomes. Consider requiring that the costs of undertaking these steps and mitigating gentrification be built into the budget for service enhancements.
- Support the removal of the state prohibition of inclusionary zoning and restore the right to adopt it by cities and counties.

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7. Equity goals and policies are only as good as their implementation – as such, additional guidance is needed to ensure an equity lens is used consistently in decision-making. One place that this could occur would be in a significantly revised Chapter 8, Administration and Implementation. This Chapter should be used to establish the expectations around the consideration of the benefits, burdens, missed opportunities and unintended consequences of decisions made using the Comprehensive Plan, including, but not limited to, infrastructure-related decisions. Additional guidance is needed to outline how the “Integrated Goals” are to be used – and how they are weighted compared to the other goals in the CPU.

In addition, combating institutional racism requires persistent review of policy consequences once policies have been implemented and in place. The CPU should include review and updating process guidelines to assess and monitor the outcomes and impacts from policy and investment

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[decisions. Furthermore, an expanded Chapter 8 could help establish the policy framework for goal-based budgeting and the utilization of an equity lens in the development of the budget. Chapter 8 presents the best opportunity to ensure that the Equity Framework outlined in the Portland Plan is carried through to implementation.](#)

8. **Infrastructure equity can be achieved not only by bringing services to people, but also by providing historically underserved populations opportunities to live where services already exist (e.g. bring people to services).** Often the neighborhoods with the best access to services are less affordable. The CPU should address the need to 1) invest in affordable, [physically accessible, fair](#) housing in areas that currently have higher levels of service, and 2) stabilize communities at risk of displacement that currently have good services. The IE PEG assumes that other PEGs (especially the Neighborhood Centers PEG) are reviewing draft housing policy language in this regard and thus does not offer specific recommendations in this area.

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9. **Transportation plays the pivotal role in moving toward greater infrastructure equity.** Transportation is the means through which Portlanders access other community services (e.g., parks) and jobs. Without transportation infrastructure services, many other important services are not easily accessible. Of all the services that the City provides, transportation is the one where disparities are most evident at present. This results from many different factors, including private development standards, historic disparities and varying terrain.

Furthermore, the City's ability to effectively address transportation disparities is affected by the number of partners involved (e.g., the roles of ODOT, TriMet and other partners in infrastructure development, maintenance and service delivery), [the lack of sufficient funding, and the gaps in basic transportation infrastructure in annexed areas.](#) Finally, because of the close tie between transportation improvements and adjacent property values, the risk that gentrification may result from transportation investments is particularly high.

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**Some recommendations (for Chapter 7):**

- Because of transportation's pivotal role, it is especially important that basic services be provided for all Portlanders (safety and access) above enhancements. This equity and basic services language is missing and should be included in Chapter 7.
- [Among projects that provide basic services for areas or populations lacking them, a higher priority should be assigned to projects that complete a network or connect modes, if sufficient resources are not available to address all gaps in basic services.](#)
- Policy 7.24, Project Prioritization, does not address equity at all, but it should. While VMT is an important consideration, it is not the only consideration for choosing capital improvements. [This policy should also acknowledge that some transportation funding is project-specific.](#)
- Restate Goals 7A-7C to incorporate physical accessibility.
- The hierarchy of transportation modes included in Policy 7.6 should be context-sensitive, flexible and responsive to neighborhood input. This could be addressed by incorporating some of the language about context sensitivity from Policy 7.1.b.
- There are several places where flexible design standards could be reinforced as a means to achieve greater equity. Tie Policy 7.1.b into neighborhood plans (as a reference point for context). Policy 7.1.c (design standards and guidelines) suggests uniform standards for street design; the need for conformance to these standards should be balanced with the need to address local context and community concerns.

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- Develop policies related to addressing substandard transportation infrastructure in large annexed areas in Southwest and Outer East Portland. Local Improvement Districts (LIDs) are more likely to occur if they are partially subsidized.
- To better address equity concerns in Policy 7.25, Funding, use a more active verb than “encourage” to promote the identification and utilization of subsidies to help underwrite the participation of low income property owners (or property owners serving low income tenants) in LIDs.
- Split Policy 7.1.a into two policies---one dealing with safety, convenience and comfort and the other dealing with access regardless of age or ability.
- Marine transportation should be addressed somewhere in the CPU.
- Recognize transit mobility challenges across different quadrants of the city. Tri-Met’s hub-based transit network does not serve cross-town commuter needs. In particular, north/south transit service in outer East Portland is lacking. As a result, residents turn to driving or transferring on lengthy transit rides. Transit access to jobs in outer East is especially lacking.
- Consider whether the green hierarchy meets the needs of an aging population, or whether it better fits a young, mobile population. Furthermore, it is not clear if or how the green hierarchy applies to commercial and industrial areas.

10. Equity and infrastructure equity should be better integrated into the city’s Urban Design Framework, Chapter 5: Urban Design and Development, and in the future development and evaluation of the Growth Scenarios. As outlined in Integrated Goal 1: Equity, if “Portlanders of all cultures, ethnicities, abilities and economic backgrounds” are to “have access to the opportunities they need to advance their well-being and achieve their full potential,” and if communities are to “equitably share the benefits of growth and change,” with “no one community [being] over-burdened,” then the physical design of the city should reflect this goal.

The physical organization of the city does not occur in a vacuum; it affects places and the people who live and work in them. Thus, there is a strong need to consider how the city’s commitment to equity should be reflected in its physical form. The next iteration of the Urban Design Framework, and ultimately the Comprehensive Map, should address how equity is supported through the physical form of the city.

**Some Recommendations (for Phase II of the Planning Process):**

The IE PEG recognizes that additional information is needed to understand and analyze the interplay between the proposed urban design framework and equity concerns. This information should be provided during Phase II of the planning process, and Chapter 5 and the Urban Design Framework should be revised in light of what is learned. As a start, the following information should be provided:

- The gentrification risk maps should be superimposed on/compared to the growth scenarios map to better analyze the risks of inducing gentrification through growth.
- The demographic data maps (communities of color, low income communities, renters) should be superimposed on maps of the urban design framework to better understand the opportunities and risks associated with the proposed urban design framework.
- Information should be provided regarding how the growth scenarios perform relative to vulnerable populations and vulnerable places, not just citywide.
- Overlay the Neighborhood Prosperity Initiative areas on the centers map and look for gaps. A map showing areas within walking distance but that lack safe routes, along with centers,

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could help identify gaps. Put schools on the centers map because community services are happening at school sites.

The Growth Scenarios, only briefly previewed by the IE PEG at this point, appear to have profound implications for infrastructure equity, yet infrastructure equity is not currently among the criteria proposed to be used to evaluate and rate the scenarios. This needs to be addressed. The following questions are among those that should be considered. Further refinement of the Growth Scenarios to look at population-based and more localized performance measures may help to answer them:

- Who will pay for the cost of infrastructure to support growth?
- Will the city make public investments to support growth before ensuring that all Portlanders have access to a basic level of service and that priority maintenance needs are met?
- If developers/new residents are paying for costs of infrastructure associated with growth, where should growth be concentrated so as to best leverage this resource to address gaps in basic service levels?
- Will growth result in newly substandard service levels in areas that had a basic level of service or better before growth occurred?
- How can growth be focused so as to minimize gentrification and displacement? What tools are required to minimize the displacement effects of growth on existing residents and businesses?
- How can the physical accessibility of centers with good transportation linkages be enhanced, and how can higher levels of physical accessibility be required for new infill residential development near centers with good transit access?
- How do the performance measures interplay with the bureau's level of services?

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# Infrastructure Equity Policy Expert Group: Addendum Report

Draft April 22, 2013

*Below are excerpts from IE PEG meeting notes and survey results that are intended to serve as raw data for preparation of a feedback report to BPS staff.*

## General Comments

### 1. Infrastructure Equity (from August 2012 meeting)

- Considers the availability, quality and comprehensiveness of services and facilities on a geographic basis; geographic equity
- Benefits all population groups
- Consistent goals/levels of service: available everywhere
- Equal is not the same as equitable
- Responds to population needs by geography and groups
- Addresses historic disparities; recognizes history and outcome disparities when considering consistency and equality
- Do no harm bottom line principle for communities that have been negatively impacted in the past
- Addresses future growth and changing demographics
- Comprehensive: considers up front what is best both for the whole community and for varied populations
- Seeks to find common ground among conflicting goals; is there a solution that benefits all that isn't a compromise for some groups?
- Involves people who are affected in the planning and prioritization
- Shares costs and burdens
- Supports better quality of life and increased access to opportunity
- Provides meaningful and realistic options and choices
- Includes proactive actions to address needs of populations with low expectations, due to history of negative interactions with city services

### 2. Intended/unintended consequences and institutional racism (September 2012 meeting)

- Intentions matter. Awareness is key.
- Gentrification may be both an intended and an unintended consequence of a public investment, depending on the underlying public policy and how it relates to class and income.
- Institutional racism occurs when a dominant group acts based on its own interests, either without regard to the interests of other groups or with intentional disregard for the interests of other groups.
- The discussion should focus not on assigning blame, but on assigning responsibility for problems and their solutions.
- The regional plan prioritizes investments in areas that already have healthy community infrastructure, such as corridors and center. Is this the right path?
- The bike plan focuses investments in areas with lots of cyclists. Is this the right path?
- How we pay for infrastructure matters. If bonds are used to finance infrastructure, the costs to property owners may drive up rents.

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- If local people are not involved, unintended consequences can result. Community involvement is key. In the Cully neighborhood, the community is organizing, leading to increased attention on monitoring for the possibility of gentrification and other consequences of public investment.
- The key question is whether benefits and burdens are shared among all communities. We need to look at what consequences have resulted and what to do in the future.

### 3. Key Definitions (from March 2013 meeting)

The IE PEG identified the following concepts as ones that might be more prominently defined and explained in a central place, such as the Glossary:

- Economic vitality: Reframe so that it incorporates equity through access to opportunities and services for all, not just dollars/profits (see Chapter 3).
- Quality of life
- Underserved/underrepresented populations and communities
- Green
- Access to opportunity (also access, accessibility)
- Community values
- Equitable, equitably
- Gentrification

In deciding what to define and how to define it, staff should consider when words are “terms of art” and when they are just too vague.

## Public Facilities and Services (Chapter 6)

### 4. Goal-level discussion (Goals 6A – 6C, from January 2013 meetings)

- Many comments that goal statements (aspirations) are not realistic, given existing conditions. Want some terms defined.
- These statements seem to assume that high quality infrastructure is the ultimate goal, that all Portlanders have equal access to services, that there is no need to make trade-offs between goals, and resources are unlimited. The statements also seem to assume that the City already has the capacity (in training, information, culture) to make equitable decisions and that legitimate community voices are able to participate in planning processes. Further, the statements seem to assume that community goals align with system needs.
- What does “optimal level of service” mean? Is level of service based on performance or on design?
- Potential impacts or unintended consequences of these goals (for communities of color or people with disabilities) include displacement results from gentrification, cost-of-service pressures on low income households (and people with disabilities), differing levels of service across Portland’s geographies, service design may not meet needs of communities that can/do not participate in goal-setting, and spatial and temporal impacts of localized infrastructure projects.
- Things to add to these goals: a hierarchy for investment needs, more guidance to bureau investments on infrastructure. For investment hierarchy, give priority to Portlanders with less ability to deal with disparities, and/or historically underserved areas; give priority to basic levels of service to all Portlanders before achieving good-to-optimal levels (anywhere in Portland).
- Which infrastructure systems should get priority investment, and why?
- All Portlanders deserve equitable levels of service; supporting prosperity citywide means bringing everything up and reducing disparities.

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- Make clear we have a long way to go, for more equitable outcomes. We need to address the risks of gentrification and displacement.
- Need to measure services against the goals.
- Consider life cycle costs, not just initial investment.
- What is the community's willingness to pay for different levels of service? That would tell us where we need to improve, and in what ways.
- Human and environmental health go together, and are both integral.
- For Goal C, define the recovery period (24 hours or 6 months?) and consider "functional during a catastrophic event" (by prioritizing communities least able to survive without services, and anticipating those events).

## 5. Policy-level focus (from February 2013 meeting)

Policy Shift: The goals and policies should more strongly support a culture and policy shift toward integrating equity in all decision making, and prioritizing investments in underserved communities. Additional discussion by the IE PEG may help to identify specific opportunities where language could be added or modified to more strongly support this policy shift.

- **Priorities and Tradeoffs:** The Discussion Draft does not give clear enough direction to City departments about how to balance competing needs and concerns and make trade-offs. Ideally, the draft should help departments choose projects and develop budgets in ways that promote greater equity.
  - Be intentional in the use of action verbs such as *prioritize*, *require*, *encourage*, *balance* and *consider*. Fit verbs to situations. There needs to be a term that describes how to make choices/tradeoffs among non-equivalent outcomes.
- **Costs of Services:** How the costs of services will be distributed is a key component of equity. Ability to pay needs to be considered. Cost recovery is mentioned with respect to some services but not others; is this intentional?
- **Equity and Accessibility are Missing or Meaning is Unclear:** Be more intentional about when equity and accessibility are included in a goal or policy, and when they are not. Give consideration to how they are included.
  - Look at policies that specifically call out certain communities. For example, consider whether it is appropriate to prioritize community policing services for historically underserved communities (Policy 6.74.a) when the same communities are not called out as being prioritized for other services (parks, sidewalks, etc.).
  - Accessibility should be integrated into Policies 6.64-6.67 (Park improvements, Trails system, Natural areas and Community centers) instead of through a separate policy (6.69 Special recreational facilities). Should also be integrated into 6.81 (Public safety/Emergency response in City facilities).
  - The terms *equity*, *equitable* and *equitably* need to be defined in a way that helps staff operationalize equity. The Portland Plan should be the source of these definitions.
  - Equity should be better integrated into the policies, rather than stand alone. For example, Policy 6.16 might be amended to read as follows: "Consider community health impacts, equity outcomes, and watershed health risks *equitably* when planning, designing and funding capital improvements."
  - Flexible design (Policy 6.25) should include proactive communication with people with disabilities.

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## Transportation (Chapter 7)

### 6. Goal-level discussion (from January 2013 meetings)

- Consider consolidating several transportation goals (they seem redundant). Could combine 7.B – 7.D, then delete 7.A.
- Transportation goals seem like a big leap from where we are today.
- Currently, more dense neighborhoods are less affordable.
- Define transportation system and relate to City's partners. Does that system include transit?
- Should be more emphasis on mobility across different quadrants of the city.
- Much of our transportation system depends on investments and choices made by partners such as Tri-Met and ODOT. What leverage do our goals have on what they do? Need to be clearer about what the City is able to do.
- Goals do not mention the need to address risks of gentrification and displacement (e.g., streetcar potentially leading to gentrification and displacement)
- "Vulnerable populations" is not the appropriate term to use; consider underserved.
- Subtle car-bashing implicit in goals.
  - For some people, car is only reasonable means of transportation
  - Large low income families are not likely to go to grocery on a bike
  - People need transportation choices
  - Alternatives to the car need to be efficient and affordable
  - Should articulate why there is a need to move away from automobiles
  - Transit relies on high-density neighborhoods, which currently are among the least affordable. \Therefore, those who most need transit access are more likely to live in less dense neighborhoods.
- Goals 7.A – 7.C lack language about accessibility or capacity (e.g., ability to accommodate multiple wheelchairs). Accessibility is not addressed in these goals at all.
- Goal 7.E and Goal 7.F seem to contradict one another on traffic fatalities. Goal 7.E would seem to require vehicles to move fast; Goal 7F would seem to require vehicles to move slowly.
- Goal 7.B assumes there is neighborhood and civic quality of life to reinforce. Assumes community and individual health goals are same for all communities. People will not give up their cars unless alternative modes are more efficient than driving. How can we account for future transportation changes? How can the CPU stay flexible and responsive?
- For Goal 7.C, add safety.
- For Goal 7.E, regional and national markets are probably more important for most small/local businesses than world markets.

### 7. Transportation Policy Clusters: 1) Affordability, Transportation Modes & Accessibility; and 2) Investment Priorities (from March 2013 meeting)

- Prioritize basic improvements to provide a basic level of service for all Portlanders (safety and access) above enhancements. This is a key infrastructure equity issue.
  - This equity and basic services language is missing and should be included.
  - Need more specific "balancing" and "prioritizing" language that address the relative priorities of "gold-plated" services, maintenance of existing services and providing basic level of services for all.

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- Policy 7.24, Project Prioritization, does not address equity at all, but it should. Vehicle Miles Traveled (VMT) is an important consideration, but it is not the only consideration, for choosing capital improvements.
- The hierarchy of transportation modes (Policy 7.6) should be context-sensitive and also flexible and responsive to neighborhood input. This is a key infrastructure equity issue.
  - The hierarchy of modes should include some of the language about context-sensitivity from Policy 7.1.b.
- The Comprehensive Plan should provide clearer guidance on how to address substandard transportation infrastructure (and how it is paid for) in large annexation areas, including sections of outer SE and SW Portland. The annexation agreements do not always provide this guidance.
  - Local improvement districts (LIDs) are more likely to occur if partially subsidized, as they have been in the past.
  - To help address equity impacts of LIDs, use a more active verb—like “encourage”—to promote the identification and utilization of subsidies to underwrite the participation of lower income property owners.
  - If we establish policies to subsidize LIDs for streets, should this also apply to other infrastructure systems as well?
- Flexibility
  - Tie Policy 7.1.b (design responsive to context) into neighborhood plans.
  - Policy 7.1.c (design standards and guidelines) suggests uniform standards for street design; however, to achieve context sensitivity and responsiveness to community concerns, not everything has to be/look the same.
  - Right-of-way policies (6.21 – 6.25) should discuss what the ROW can be used for—not just cars or pavement.
  - Access to walking as a mode of transportation can be accomplished in a variety of ways. Paved sidewalks are just one option.
- This chapter is thin on funding discussion, beyond long-term maintenance costs. This needs to be fleshed out more.
- Policy 7.1.a should be divided into two policies, one dealing with safety, convenience and comfort, and the other addressing transportation access for all regardless of age, ability or mode.
- Marine transportation—the rivers as transportation corridors—needs to be addressed in the Comprehensive Plan.
- How does green hierarchy apply to retail and commercial areas?
- Add a policy addressing the need to assign a higher priority to projects that complete a network and connect parts of the overall system, especially those that support connections between modes (multi-modal functionality).
- Look at public/private partnerships to pursue and share costs of infrastructure improvements.
- Policy 7.2 is both too vague and too specific. Goal language is better.
- Maintenance needs should be more prominent and given a higher priority.
- Transit system design doesn’t address the needs of low income people well because of limited efficient options linking where people live and where they work.
- Is the green hierarchy building a city for a young/mobile population, while the city’s population is aging currently?

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- Lifecycle costs and reliability do not have enough prominence. A stronger verb might help.
  - Lifecycle costs are at the core of what we can afford.
  - Lifecycle costs should be part of the project prioritization criteria stated in 7.24.
- Demographic information should be included in Part 2 Maps.

## Centers, Corridors and Growth Scenarios

### 8. Centers and Corridors and Growth Scenarios (from April 2013 meeting)

- Expanding centers will require a lot of expensive infill development. Explain how we plan to induce that development.
- Concentrations of youth should be considered among the “vulnerability risk factors”.
- Need to involve local communities in planning and implementation of a center. Emerging economic development strategies call for communities to help shape activities and services.
- Overlay the Neighborhood Prosperity Initiative areas and schools onto the centers map, and look for gaps. Some community services are located at school sites. There are places where it isn’t safe for students to walk (and therefore must be bussed); this could help identify gaps where there is a need for investment in safe routes.
- There needs to be something between civic corridors and greenways, because in some places neither of those are an option.

### 9. Growth Scenarios (from April 2013 meeting)

- The existing conditions in areas designated for future growth are not the same citywide. Some have infrastructure in fairly good condition, while others have gaps. Thus, areas with service deficiencies will require more investment to support growth. The designation “underserved areas for growth” means that these areas are more likely to be brought up to standard, perhaps through a combination of public and private investment. Conversely, “concentrating growth in areas with fully developed infrastructure” means that city resources may be more available to bring other areas—ones not designated for growth—up to a minimum standard. Further analysis of the infrastructure equity consequences of designating particular areas for growth is required. The performance measures should be nuanced to show how the scenarios perform across different demographic groups (not just geographic based).
- Investment should be further defined, especially if it includes both direct public investment and the provision of public incentives.
- The big issue along Powell Blvd is related to maintaining affordable housing, as that area shows up as being at risk for displacement.
- Access to frequent transit service should be determined using actual headway designation.
- The performance measures should not just look at “total” or “citywide” – but instead address impacts on specific populations and vulnerable places. Specifically, compare the growth scenarios with gentrification risk areas area maps and demographic maps (communities of color, renters, low income) to analyze how the growth scenarios perform for particular demographic groups and vulnerable communities.
- Performance measures should include sidewalks and unpaved roads. (Note: sidewalks are incorporated into the “complete neighborhood” measure.)

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- It would be useful to look at what is behind the areas that aren't a complete neighborhood (e.g. is it a lack of sidewalks or something else like commercial components?).
- What worked well in Cully is that the community was actively engaged, which helped build support, impact what was done and reduce displacement.
- The maps show the lack of frequent service transit in East Portland and N and NE Portland. It seems clear you can't have a complete neighborhood without frequent service transit. Transit should be considered in the growth scenarios analysis and in choosing among investment options. The IE PEG is interested in seeing an overlay of vulnerability and the centers.
- Analyze which scenarios give us growth and investment in incomplete neighborhoods. Show how the performance measures relate to the infrastructure bureau levels of service (e.g. how they measure their performance).
- Sometimes we need to maintain the strength of the consolidated culture that exists in many communities.
- The performance measures don't seem to connect to equity beyond the issues of gentrification and access to jobs. What about access to good education and affordable healthcare? Those might be considered performance measures – they seem at least as important as tree canopy.
- Provide information about the metrics used for the performance measures.
- Be more explicit about the availability and effectiveness of the regulatory sticks and carrots for mitigating some of the impacts of gentrification. Acknowledge and consider how difficult it will be to solve – in part because of the amount of private investment and choices that are beyond what public interventions can impact.
- Be explicit about what is considered in the transit trip to jobs measure. If people are faced with a 60 minute bus ride or a shorter car trip, they'll pick the car. The macro-picture shows that residents of East or North Portland don't have shorter transit trip options available. In some cases that might be a lack of transit (e.g. East Portland), in other instances it might be something else (e.g. transit is available, but there isn't a direct route to where the jobs are located).

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