Memorandum

To: Comprehensive Plan Management Team

From: Neighborhood Centers Policy Expert Group staff: Bill Cunningham (BPS) and

Steve Faust (Cogan Owens Cogan)

Subject: Feedback from the Neighborhood Centers Policy Expert Group

The purpose of this memorandum is to convey recommendations from the Neighborhood Centers Policy Expert Group (PEG) on refinements to the draft Comprehensive Plan policies. This memorandum focuses on those recommendations that received broad support from PEG members during discussions on the draft policies that took place during PEG meetings in February through May of 2013. Other suggestions by individual PEG members for policy refinements, but that did not have broad support, are documented in the meeting summaries from these discussions.

The Neighborhood Centers PEG recommendations included in this memorandum concern those policy sections that were the focus of PEG discussions: Urban Design and Development (Chapter 5), Housing (Chapter 2), and the Neighborhood Business Districts policies of the Economic Development chapter (Chapter 3). In addition to the specific recommendations detailed below, PEG members recommend that a key goal of the Comprehensive Plan should be to foster places where people *want* to live and have the *choice* to stay. PEG members believe it is critical that everyone should be able benefit from the improvement of centers and their neighborhoods, and not be displaced as areas become more desirable.

Major Policy Recommendations

- 1. Prioritize improvements in centers with deficiencies. A topic within the draft Comprehensive Plan that PEG members feel especially needs to be strengthened regards the prioritization of centers for improvements (Policy 5.19, Focused investments). Improvements to centers, including infrastructure and economic development efforts, need to be targeted to centers with deficiencies. Policies should also provide guidance on the relationship of centers-focused investments to other city priorities. PEG members would like the Comprehensive Plan update to identify which centers to prioritize for near-term planning and investments, using criteria from the Portland Plan as a guide. PEG members would like refinement of policies regarding centers and their prioritization to consider the following:
 - a) Policies regarding growth and investments need to be responsive to the fact that Portland has limited resources, which requires a very strategic approach to maximize outcomes. Target policies and implementation approaches to places where they will do the most to improve outcomes (including the Portland Plan's measures of success). East Portland, in particular, should be a focus of investments to improve outcomes, given the area's infrastructure and services deficiencies, large number of people, continuing growth, and historically disadvantaged communities.
 - b) Orient the policies and priorities regarding centers and investments in communitysupportive infrastructure to help address a range of issues, such as improving and

- expanding access to services and jobs in places with concentrations of poverty, enhancing the community infrastructure that supports youth success, and expanding and diversifying housing opportunities. Fostering well-functioning centers in areas across Portland should be considered a key means to expanding local access to these opportunities.
- c) Consider zoning changes as part of an integrated approach to improving areas with deficiencies. Consideration of whether zoning patterns are contributing to positive outcomes in these areas needs to be a focus, including identification of situations in which zoning may be serving as a barrier to economic development by creating nonconforming uses.
- d) Consider opportunities for bringing housing and jobs closer together. The Comprehensive Plan update should identify centers or corridors where more jobs could be located to improve access to jobs.
- 2. Strengthen the role of employment in the centers policies. Consider refining policies to be more intentional about locating employment in centers. Employment should be of greater scale and concentration in centers than other areas. Policy language should be added that prioritizes centers as a location for business incubation and for empowering the community though providing local access to living-wage jobs.
- 3. Commit to area-specific plans for centers. Provide a policy commitment to creating area-specific plans for each center. Area-specific planning is needed to respond to the differing characteristics, needs, and populations of centers and the areas they serve and to engage the community in policy refinement at a local scale. These plans should include a focus on implementation actions and priorities and should be considered a key means to target infrastructure improvements and be strategic with investments. Planning for centers should strive to involve community members in the improvements, including finding ways for community members to benefit from the creation of jobs and the economic success of centers. Policies should also encourage the use of partnerships and community benefit agreements. Area planning should respond to the distinctive character of each area, while also taking measures to avoid displacing residents and businesses.
- 4. **Provide policy support for small neighborhood commercial areas.** Policies should recognize and support the role of smaller neighborhood business nodes, such as small clusters of retail or corner markets, in neighborhood economic development (possibly as a sub-policy to policy 3.54). Provide policy support for small commercial nodes to help fill in service gaps, recognizing that not everyone will live within convenient walking distance of a center or corridor.
- 5. **Focus housing affordability policies on low-income households.** Focus policy 2.8 (Housing Affordability) more narrowly on serving low income households. Target Portland's limited housing resources to helping households whose housing needs are not being met by the private sector.
- 6. **Bring other policies and implementation approaches in alignment with the housing affordability policies.** The Housing Affordability policies should work in conjunction with policies in other chapters to contribute to housing affordability and stability. Consider the impact of other Comprehensive Plan policies and implementation approaches on housing affordability, including the compatible design policies, seismic safety and infrastructure policies. Policies and implementation approaches should work together to facilitate the ability for people to remain in their homes over time (for example, street improvements and local improvement districts should not result in costs that overburden and displace

- residents). It is also important to view the housing affordability policies as part of a broader household prosperity strategy, which includes improving access to quality education and raising incomes.
- 7. **Broaden the fair housing polices to consider the impacts of City actions**. In the Fair Housing policy (2.4), require analysis of the disparate impacts of land use planning, regulations, and infrastructure improvements on protected classes. The Fair Housing policies should have a connection to the Plan for Fair Housing Choice and include policy language about avoiding segregation.
- 8. Address areas with concentrations of poverty. The Opportunity Areas policy (2.5) calls for bringing opportunities to areas that already have affordable housing; but stronger policy is needed that prioritizes meeting the needs of people living in high poverty areas. Meeting the needs of people in high-poverty areas is more than about affordable housing, but also about access to services, quality of life, schools, and public safety.
- 9. **Incentivize desired outcomes.** Policies should provide support for regulatory approaches that incentivize desired outcomes that the private market may not provide on its own. In particular, future zoning code refinement should provide development allowances that incentivize the creation of affordable housing, accessible units, and open space.
- 10. **Assess health and equity impacts.** Policy support is needed for creating and utilizing assessment tools for understanding health and equity impacts. Having these tools will be essential for implementing policies that call for considering such impacts (such as Policy 6.16, which calls for consideration of the health and equity impacts of capital improvements).

Other Recommendations that Received Broad Neighborhood PEG Support

- Improve the organization of Chapter 5 (Urban Design and Development) to provide greater clarity about what a center is. Lead with policy 5.22, describing the types of centers.
- Strengthen the link between the center typologies of policy 5.22 and investment priorities in policy 5.19. Also provide cross-references to other centers-related policies, such as housing and affordability, in the centers policy section.
- Modify policy 3.52 (Neighborhood Business Districts, District Function) to state that neighborhood business districts are "part of the foundation of neighborhood livability."
- Refine the Neighborhood Business Districts and Centers section of the Economic Development chapter to clarify how neighborhood business districts related to centers. For example, if the Central City is considered a center, does that mean that it is a "neighborhood business district"?
- In policy 3.59 (Neighborhood Business Districts, Centers), mention social services as key components of centers, in addition to commercial services.
- Rename the Housing Discrimination section to "Housing Opportunity" or "Housing Equity."