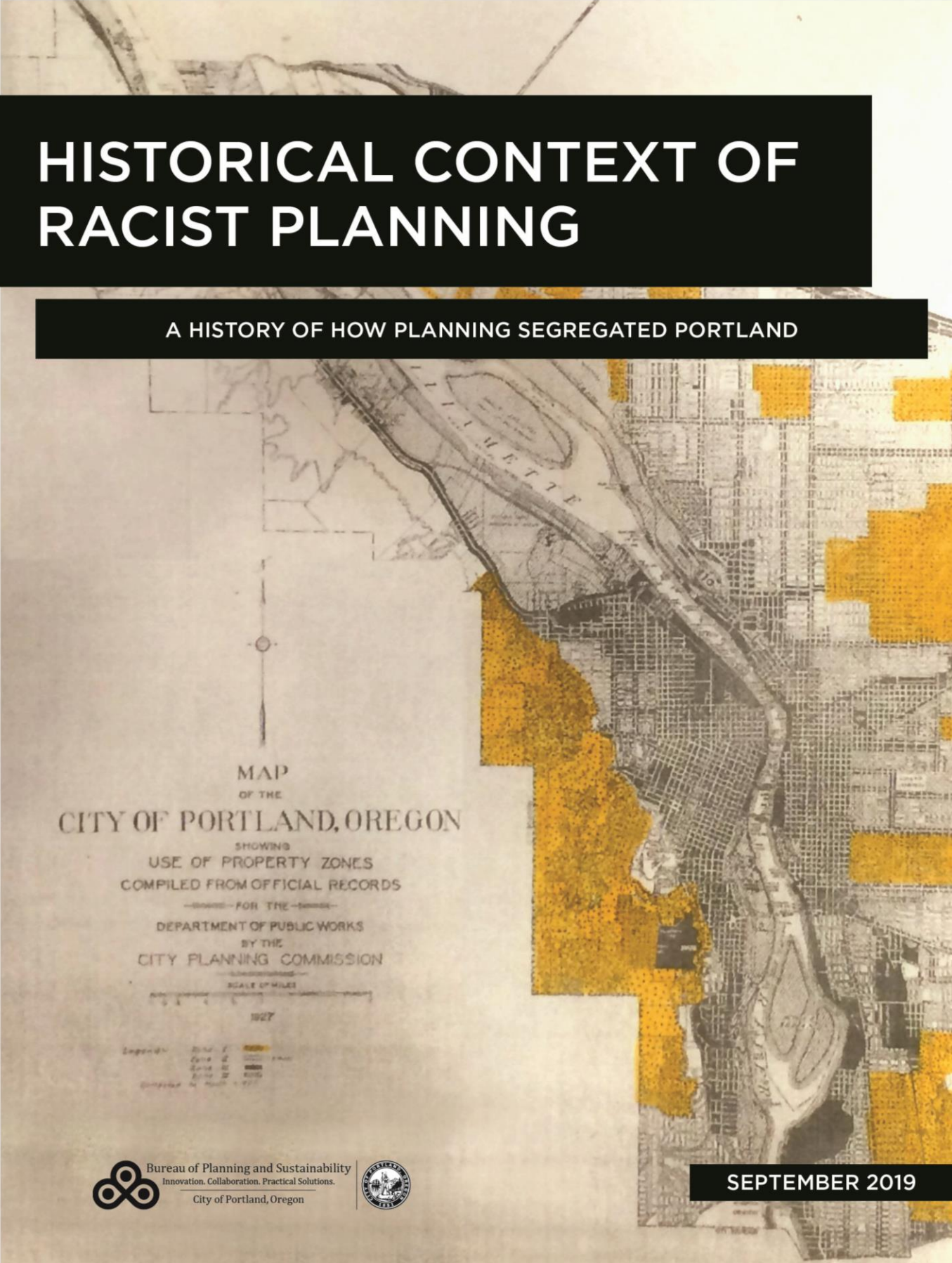


HISTORICAL CONTEXT OF RACIST PLANNING

A HISTORY OF HOW PLANNING SEGREGATED PORTLAND



MAP
OF THE
CITY OF PORTLAND, OREGON

SHOWING
USE OF PROPERTY ZONES
COMPILED FROM OFFICIAL RECORDS

—SOUND— FOR THE —SOUND—

DEPARTMENT OF PUBLIC WORKS
BY THE
CITY PLANNING COMMISSION

SCALE OF MILES

1927

Legend: Zone 1 (Yellow) Zone 2 (Grey) Zone 3 (Black) Zone 4 (White)



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Bureau of Planning and Sustainability (BPS)

Primary Author

Jena Hughes, Planning Assistant

Contributors

Tom Armstrong, Supervising Planner

Ryan Curren, Management Analyst

Eric Engstrom, Principal Planner

Love Jonson, Planning Assistant (former)

Nick Kobel, Associate Planner

Neil Loehlein, GIS

Leslie Lum, East District Planner

Deborah Stein, Principal Planner (former)

Sandra Wood, Principal Planner

Joe Zehnder, Chief Planner

Communications

Eden Dabbs

Cover Design

Krista Gust, Graphic Designer

Bureau Partners

Avel Gordly, Former Oregon State Senator

Cameron Herrington (Living Cully)

Allan Lazo (Fair Housing Council of Oregon)

Kim McCarty (Portland Housing Bureau)

Felicia Tripp (Portland Leadership Foundation)

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INTRODUCTION

The City of Portland, as a recipient of federal funding, is obligated to affirmatively further fair housing and otherwise meet the federal Fair Housing Act. In the past, most of the City's focus has been on preventing discrimination and differential treatment in the housing market. More recently, jurisdictions have been reviewing their land use planning and zoning decisions to ensure they don't create unnecessary barriers to building affordable housing or unintentionally create impediments to fair housing choice. This also means removing existing barriers if they are found.

Portland, like many U.S. cities, has a longstanding history of racist housing and land use practices that created and reinforced racial segregation and inequities. Exclusionary zoning, racially restrictive covenants, and redlining are early examples of this, with their effects still visible today. These discriminatory practices have all played a role in shaping the city's urban form—and in exacerbating inequities along lines of race and class.

In 1968, the Fair Housing Act was enacted to prohibit the discrimination of people based on race, color, national origin and religion when selling or renting housing.¹ It was later amended to include sex, familial status and disability as protected classes as well. The FHA included an obligation for cities receiving federal funds to “affirmatively further fair housing,” which meant taking actions to overcome historic patterns of segregation and foster inclusive communities free from discrimination. This was to prevent future discriminatory housing outcomes and create accountability for reversing historical inequities.

“In examining the legislative history of the Fair Housing Act and related statutes, courts have found that the purpose of the affirmatively furthering fair housing mandate is to ensure that recipients of Federal housing and urban development funds and other Federal funds do more than simply not discriminate: Recipients also must take actions to address segregation and related barriers for groups with characteristics protected by the Act, as often reflected in racially or ethnically concentrated areas of poverty.”²

Still, long after its enactment, the City of Portland and other government agencies continued to engage in planning practices that have resulted in inequitable outcomes, such as community planning, urban renewal, and disproportionate upzoning in areas without protecting against displacement. These practices reinforced racial segregation by preserving the exclusivity of some predominately white single-family neighborhoods, while accelerating gentrification and displacement of people of color by concentrating growth and density in vulnerable areas.

The 2015 Affirmatively Furthering Fair Housing Rule (AFFH), a provision of the Fair Housing Act, “sets out a framework for local governments, States, and public housing agencies (PHAs) to take meaningful actions to overcome historic patterns of segregation, promote fair housing choice, and foster inclusive communities that are free from discrimination.”³ In addition to complying with this new rule, The City of

¹ U.S. Department of Housing and Urban Development, “Housing Discrimination Under the Fair Housing Act” (HUD, March, 26, 2019), https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_act_overview.

² U.S. Department of Housing and Urban Development, “Affirmatively Furthering Fair Housing; Final Rule” (HUD, July 16, 2015). <https://www.hudexchange.info/resources/documents/AFFH-Final-Rule.pdf>

³ U.S. Department of Housing and Urban Development, “AFFH Fact Sheet: The Duty to Affirmatively Further Fair Housing” (HUD, March 26, 2019), <https://www.huduser.gov/portal/sites/default/files/pdf/AFFH-Fact-Sheet.pdf>

Portland also has a responsibility to implement Comprehensive Plan policies that directly relate to fair housing, including:

- Coordinating with fair housing programs to overcome disparities (*Policy 5.10*).
- Removing barriers to housing choice (*Policy 5.11*).
- Conducting impact analyses to identify disparate impacts on housing choice (*Policy 5.12*).
- Rebuilding communities impacted by past decisions (*Policies 3.3.f and 5.18*)⁴ (for full policy language, refer to [Appendix B](#)).

Therefore, the City of Portland has a responsibility to not just *prevent* further harm and discrimination, but to also *actively address* past harms of segregation and racist policies, intentional or not.

This report provides an overview of racist planning practices in Portland that will provide grounds for framing the City’s obligations to affirmatively further fair housing. We acknowledge that fair housing discrimination takes many forms; for the scope of this report, we will look specifically at how planning practices, primarily around zoning, have led to racial segregation and other discriminatory impacts on communities of color in Portland.

EARLY PLANNING AND THE BEGINNING OF EXCLUSIONARY ZONING

1900-1930: Early zoning

Zoning is the act of separating land uses – residential, industrial and commercial – for reasons such as safety, public health benefits, aesthetics and the protection of property values.⁵ But the segregation of uses also results in the segregation of people. In the early 1900s, several cities in the eastern and southern United States adopted racial zoning ordinances to create separate areas for Black and white households, but these ordinances were overturned by the U.S. Supreme Court in 1917.⁶ While there is no evidence that local government in Portland attempted to explicitly regulate by race, many cities found workarounds to the Supreme Court decision and continued to intentionally segregate using other zoning tactics.

In 1924, Portland voters approved the first zoning code, which included four zones: Zone I–Single-Family, Zone II–Multi-Family, Zone III–Business-Manufacturing, and Zone IV–Unrestricted. Most residential areas were designated Zone II, except for 15 neighborhoods considered the “highest quality” that were designated Zone I. These 15 original single-family zones were created by request of property owners in the area (see Figures 1 and 2). Today, these zones include at least parts of the following neighborhoods:

⁴ City of Portland Bureau of Planning and Sustainability, “2035 Comprehensive Plan, Chapter 5: Housing, GP5-7” (BPS, December 2018), <https://www.portlandoregon.gov/bps/article/579169>

⁵ Charles Henry Cheney, “General Report on City Planning and Housing Survey of Portland, Oregon” (Portland City Archives, March 1919).

⁶ *Buchanan v. Warley*. Tom Angotti and Sylvia Morse, *Zoned Out!*, (Terreform Inc, 2016), 50.

- Hillsdale
- Homestead
- Southwest Hills
- Arlington-Heights
- Hillside
- Arbor Lodge
- University Park
- Irvington
- Alameda
- Beaumont-Wilshire
- Kenton
- Piedmont
- Concordia
- Sabin
- Hosford-Abernathy
- Richmond
- Laurelhurst
- Mt. Tabor
- Eastmoreland

The predominance of the Zone II (multi-family) designation was due to the 1912 Greater Portland Plan's expectation that Portland's population would reach 2 million by 1940.⁸ According to a 1934 land use survey, approximately 24 square miles of land were designated Zone II, compared to fewer than 10 square miles designated Zone I.

RELATED PRACTICE:
RACIALLY RESTRICTIVE COVENANTS

During this period, another exclusionary practice began to take shape: Private developers placed racially restrictive covenants on properties. Racial covenants were legal clauses written into a deed restricting who could own or live on the property based on race. Racially restrictive covenants were a national practice beginning in the early 1900s but were declared unenforceable in 1948 by the U.S. Supreme Court. Covenants were commonly used by developers when creating entire new developments long before the first zoning code was adopted in 1924. They also restricted uses of property and thereby served as a form of privatized zoning. Racial covenants can still be found on existing deeds of Portland homes today. For a local example, refer to Figure 3 or see an interactive partial map of racially restrictive covenants in Portland.⁷

RELATED PRACTICE:
REAL ESTATE AND THE CONCENTRATION OF AFRICAN AMERICANS IN ALBINA

For much of Portland's history, the real estate industry has played a major role in restricting where African Americans could buy and rent homes. The City of Portland did not use its powers to prevent this behavior. "In 1919, the Portland Realty Board adopted a rule declaring it unethical for an agent to sell property to either Negro or Chinese people in a White neighborhood."⁹ This language was not removed from their Code of Ethics until 1956. Albina became the only place African Americans were allowed to buy homes at the time. During World War II, jobs in the shipyards brought many more African Americans to Portland. The majority of them lived in Vanport, a public housing project constructed during the war that bordered the Columbia River. After the war ended, many of the workers stayed. But in 1948, Vanport was completely swept away by a massive flood, leaving many African American residents without a home. For most, Albina remained the only option. As African Americans continued to move into Albina, White residents moved out. "During the 1950s, Albina lost one third of its population and experienced significant racial turnover. ... By decade's end, there were 23,000 fewer White and 7,300 more Black residents."⁹

⁷ City of Portland Bureau of Planning and Sustainability, "New research by PSU grad student reveals racist covenants across Portland" (BPS, 2018), <https://www.portlandoregon.gov/bps/article/677593>.

⁸ Edward Herbert Bennet; A. L. Barbur; and Marshall N. Dana, "The Greater Portland Plan of Edward H. Bennett" (*Portland City Archives*, 1912),

https://pdxscholar.library.pdx.edu/cgi/viewcontent.cgi?article=1024&context=oscdl_cityarchives

⁹ Karen Gibson, "Bleeding Albina: A History of Community Disinvestment, Transforming Anthropology", (*American Anthropological Association*, 2007), 6, <http://kingneighborhood.org/wp-content/uploads/2015/03/BLEEDING-ALBINA-A-HISTORY-OF-COMMUNITY-DISINVESTMENT-1940%E2%80%932000.pdf>.

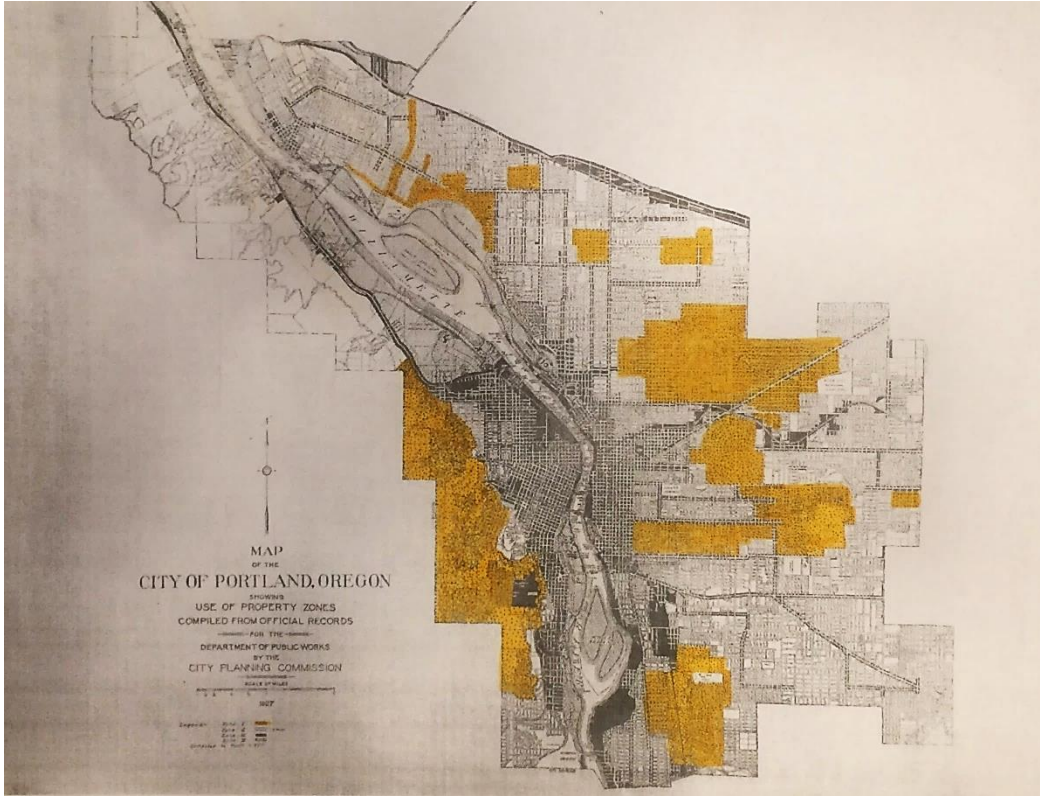


Figure 1. City of Portland map of Zone I single-family residential areas, 1927

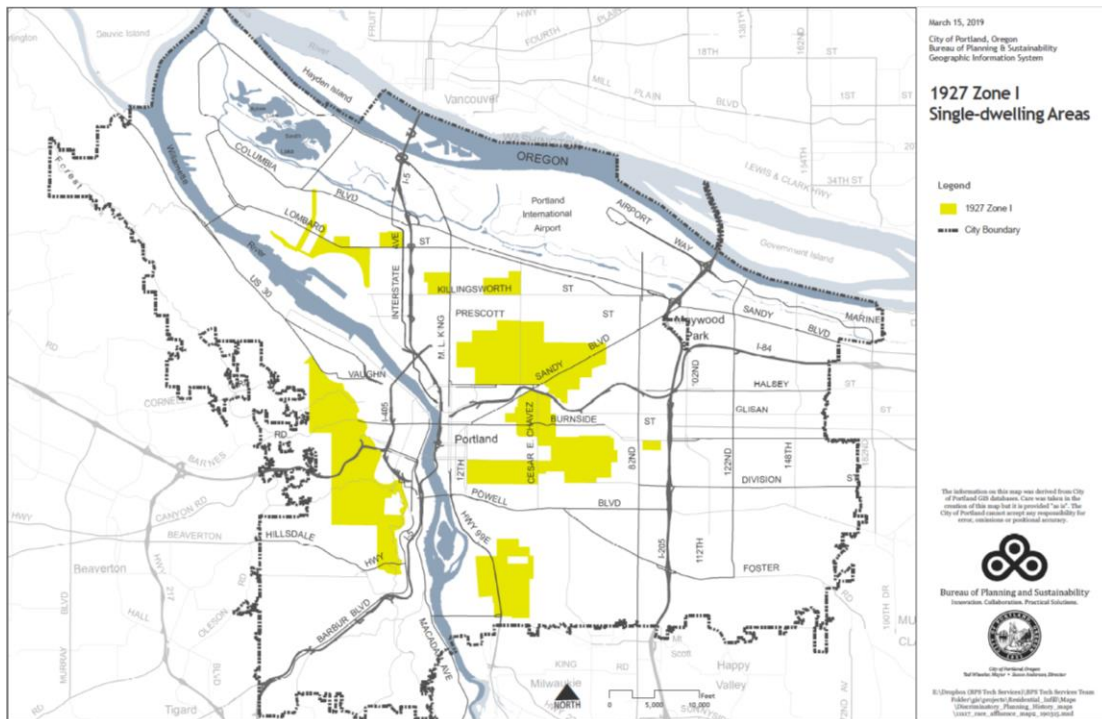


Figure 2. Current City of Portland map boundaries with 1927 Zone I single-family residential areas, 2019

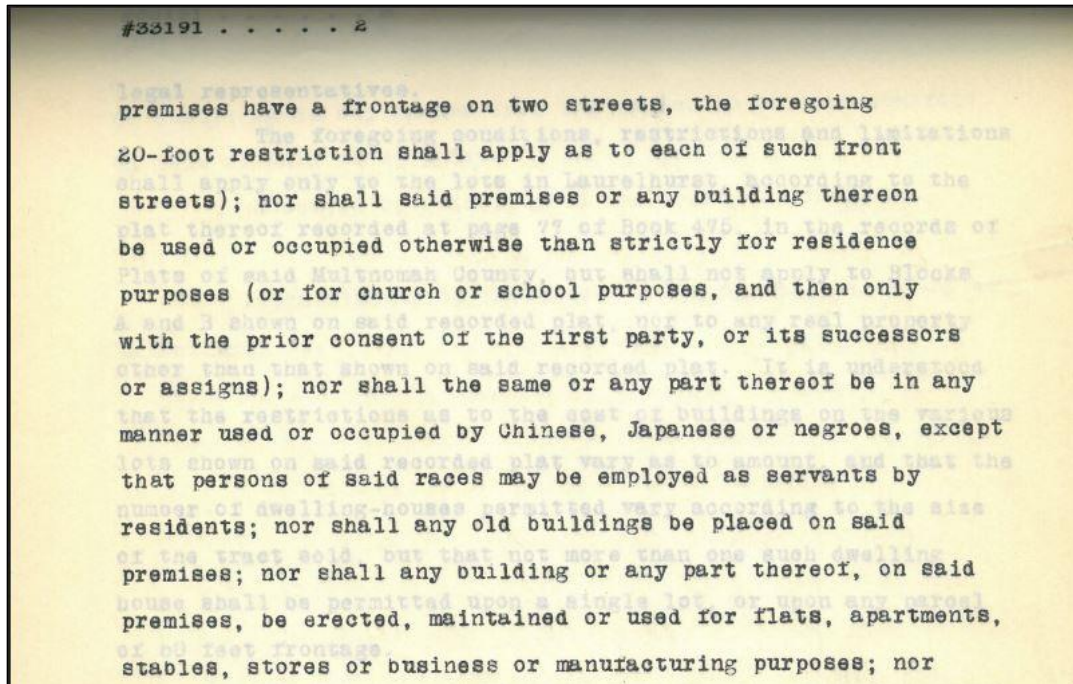


Figure 3. Racially restrictive covenant found in Laurelhurst, 1913. "... nor shall the same or any part thereof be in any manner used or occupied by Chinese, Japanese or negroes, except that persons of said races may be employed as servants by residents. ..."

1930s, 1940s, and 1950s: Expansion of single-family zoning

In 1943, New York City Commissioner Robert Moses visited Portland and created the Portland Improvement Plan, which recommended large expansions to single-family zoning:

"Residential, business and industrial uses of land are not properly segregated, and the encroachments of business and multiple dwellings into single family residential areas have destroyed the value of many private homes...Excessively large areas have been zoned for apartments, occupying 40% of the total area of the City. Portland is a city of single-family homes. We are therefore of the opinion that only a very small percentage of the area of the City should be set apart for multiple dwellings."¹⁰

In the 1930s and 40s, Portland City Council rezoned large areas of multi-family zoning, including neighborhoods in North Portland and adjacent to Mt Tabor, to single-family zoning. This was done to protect real estate values of single-family homes and make it easier for homeowners to obtain Federal Housing Administration (FHA)-insured loans in those areas.

The FHA purposefully discriminated against those living in multi-family zones when offering loans. According to Richard Rothstein in *The Color of Law*, "The FHA had its biggest impact on segregation, not

¹⁰ Robert Moses, *Portland Improvement* (Portland Mercury, 2009), 84, https://www.portlandmercury.com/images/blogimages/2009/09/30/1254339381-portland_improvement_-_robert_moses_1943.pdf.

in its discriminatory evaluations of individual mortgage applicants, but in its financing of entire subdivisions, in many cases entire suburbs, as racially exclusive white enclaves.”¹¹

Portland City Council continued to rezone large areas of multi-family zoning to single-family zoning in order to correspond with existing single-family development in North, Northeast and Southeast Portland. Though 50% of residential areas were zoned multi-family in the 1950s, 95% of residential development was single-family homes. Furthermore, several large areas of multi-family zoning were rezoned to single-family by petition of residents from the neighborhoods. In the years between 1924 and 1959, roughly 7.5 square miles had been rezoned from multi-family to primarily single-family. With enactment of the 1959 Zoning Code, another 6.75 square miles were changed from the multi-family zone to R5, R7, or R10 single-family zoning.

RELATED PRACTICE: REDLINING

The federal government’s practice of redlining was used in Portland in the 1930s as a tool to reinforce racial segregation by restricting federal lending and private lending. This made it difficult or impossible for residents living in “redlined” neighborhoods to receive residential and commercial loans. The Home Owners Loan Corporation (HOLC) assessed neighborhoods’ desirability by assigning colors on a map (red, yellow, blue, and green). Categorization of neighborhoods was, in part, determined by the average income, racial or ethnic makeup of the area. Redlined areas typically had concentrations of Black residents or other people of color and accounted for 12% of Portland. In 1937, an appraiser in the Lower Albina neighborhood noted, “This area constitutes Portland’s “Melting Pot” and is the nearest approach to a “slum district” in the city. Three-quarters of the negro population of the city reside here and in addition there are some 300 Orientals, 1000 Southern Europeans and Russians.”

“Greenlined” areas, on the other hand, tended to have a more homogenous, white, higher-income population, were zoned single-family, and accounted for 11% of Portland’s appraised area. An appraiser who had given a green grade to the King Heights neighborhood noted, “Deed restrictions expired in 1935 but is zoned single-family residential which with terrain and price levels is believed to be ample protection.”

Redlining was an important factor in preserving racial segregation, intergenerational poverty and the wealth gap between White Portlanders and most other racial groups in the city. There is evidence that it remained common for banks to practice redlining in Portland until the 1990s.¹² For a redlining map of Portland and descriptions of each neighborhood’s categorization, refer to Figure 4 and explore the *Mapping Inequality: Redlining in New Deal America* interactive map.¹³

¹¹ Richard Rothstein, *The Color of Law*, (Liveright Publishing Corporation, 2017), 70.

¹² Alana Semuels, “The Racist History of Portland, the Whitest City in America” (*The Atlantic*, July 22, 2016), <https://www.theatlantic.com/business/archive/2016/07/racist-history-portland/492035/>

¹³ Robert K. Nelson, LaDale Winling, Richard Marciano, Nathan Connolly, et al., “Mapping Inequality” American Panorama, ed. (University of Richmond, February 1, 2019), <https://dsl.richmond.edu/panorama/redlining/>

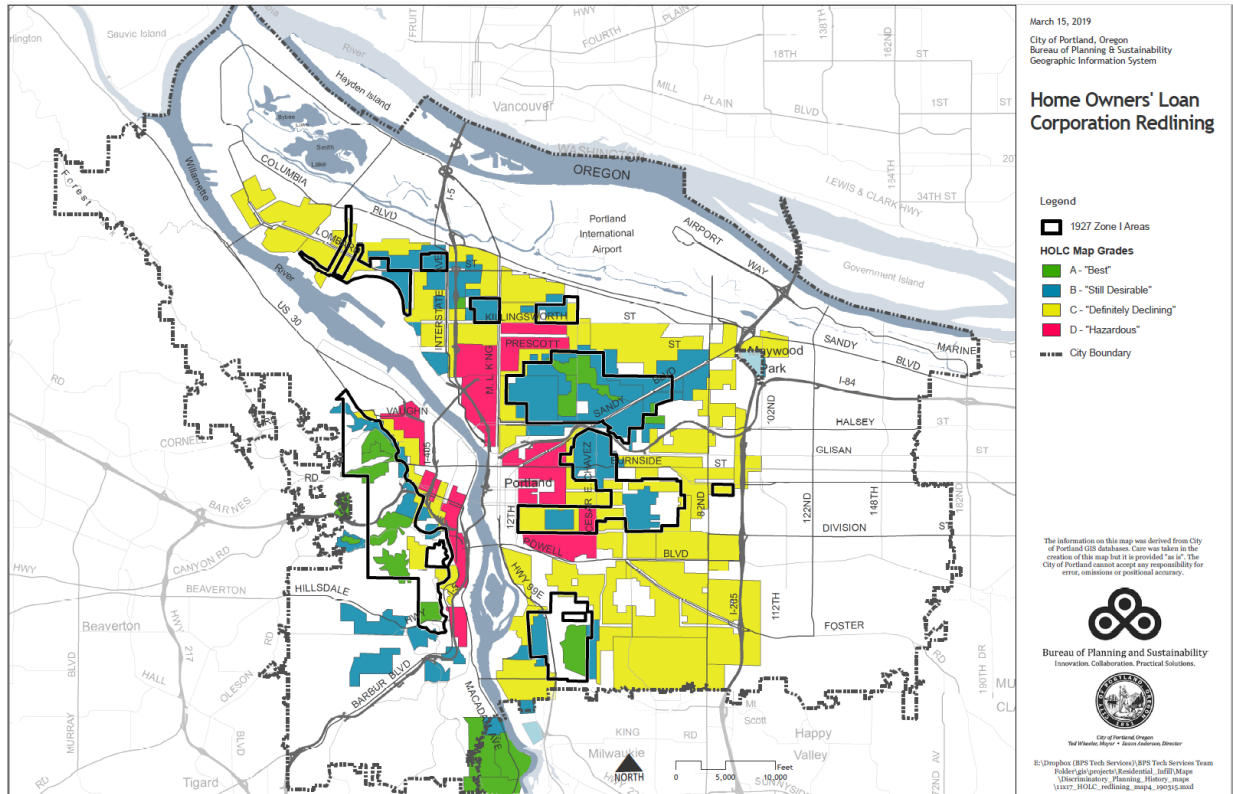


Figure 4. Map of original Zone I boundaries on top of 1938 Home Ownership Loan Corporation color grades, 2019

RELATED PRACTICE: URBAN RENEWAL

Starting in the 1950s, national trends in city planning, e.g., the federal urban renewal program and the creation of the interstate highway system, cut through Portland neighborhoods designated as “slum and blight.” The construction of Interstate 5, Emanuel Legacy Hospital, the Veterans Memorial Coliseum, and other developments used federal funds to pay for local projects that displaced many Black residents from North/Northeast Portland while predominantly white neighborhoods remained preserved.

In South Portland, once home to a Jewish and Italian community, the City of Portland used eminent domain to clear out the land for the development of what is current day downtown and the location of Keller Fountain and other new development. Residents were displaced, and many homes, businesses, and places of worship were destroyed.¹⁴

¹⁴ John Killen, “Throwback Thursday: 60 years ago, Portland began urban renewal plan for South Auditorium district” (OregonLive, February 19, 2015), https://www.oregonlive.com/history/2015/02/throwback_thursday_60_years_ag.html

CONTEMPORARY PLANNING, LATE 1960S TO EARLY 2000s

1960s and 1970s: Increased neighborhood power in planning decisions

Both politics and the civic tone in Portland changed markedly in the late 1960s and 1970s.¹⁵ An expanding electronics industry and growing universities attracted outsiders with new ideas, and the average age on Portland City Council dropped by fifteen years between 1969 and 1973. In this timeframe, Portland leaders decided to remove Harbor Drive, a multi-lane expressway on the west shore of the Willamette River, to create Tom McCall Waterfront Park as well as shift money from the proposed Mount Hood Freeway through southeast neighborhoods in favor of funding the first light rail line from downtown to nearby Gresham.

At the state level, the enactment of Senate Bill 10 in 1969 was a crucial step on the path to Oregon's landmark Senate Bill 100, passed in 1973, which created the state's land use planning program. This program required cities to have a comprehensive plan to accommodate for 20 years of growth in new households and jobs. During the 1970s, there was also a strong interest in "fair share" housing policies that aimed to distribute low-income housing throughout entire metropolitan areas.

Statewide Planning Goal 10, adopted in 1974, required that jurisdictions provide "appropriate types and amounts of land . . . necessary and suitable for housing that meets the housing needs of households of all income levels."¹⁶ Senate Bill 100 also required resident participation in planning, and in 1974, Portland City Council created the Office of Neighborhood Associations, which opened opportunities for residents to influence land use decisions in what had previously been the political realm of the real estate industry and downtown business interests. "From Goldschmidt's perspective, neighborhood associations were vital in a very explicit, tactical sense. In order to focus a planning agenda for revitalization, he needed to mobilize the consent and active participation of Portland's middle-class yeomanry."¹⁷ By 1979, 60 neighborhood associations had been established. However, the political power dynamics in favor of white, affluent residents remained.

RELATED PRACTICE: NATIONAL LEGISLATION

In response to historical patterns in which certain groups were prevented from accessing housing or limited in their housing choices, Title VIII of the Civil Rights Act of 1968, known as the **Fair Housing Act**, prohibited discrimination in housing based on federally protected classes: race, color, religion, national origin, and, as amended, sex, disability, or the presence of children in a household.

The Community Reinvestment Act was passed in 1977 to ensure that financial institutions provide credit assistance to all neighborhoods, especially low- to moderate-income neighborhoods historically affected by redlining. It was a direct response to the legacy of disinvestment and segregation resulting from redlining. Still, banks continued to discriminate in areas with large African-American populations well after it was passed.

¹⁵ Carl Abbott, "Portland (essay)" (Portland State University and the Oregon Historical Society, 2019). <https://oregonencyclopedia.org/articles/portland/#.XVyRO-hKhyx>

¹⁶ Department of Land Conservation and Development, "Oregon's Statewide Planning Goals & Guidelines, Goal 10: Housing" (Department of Land Conservation and Development, 1974). <https://www.oregon.gov/lcd/OP/Documents/goal10.pdf>

¹⁷ Dr. Matt Witt, "Dialectics of Control: The Origins and Evolution of Conflict in Portland's Neighborhood Association Program", p. 103, (Portland State University Ph.D. dissertation, 2000). <https://www.portlandoregon.gov/civic/article/363330>

In 1977, the City of Portland developed the Population Strategy to guide the creation of the 1980 Comprehensive Plan and many other major infrastructure and funding plans.¹⁸ The Population Strategy laid out a policy justification for prioritizing middle-class, educated families when making major policy decisions, investments, and plans in order to reverse the trend of “white-flight” from Portland to the suburbs. The strategy considered housing types and neighborhood character that were attractive to these priority populations at the expense of others. The document argues, “Increasingly the city is becoming a community of extremes, populated by the young and the old, the lower income and unemployed, minorities and renters.”

1980 Comprehensive Plan: More single-family zoning

Portland’s first Comprehensive Plan, adopted by City Council in 1980, expanded R5 single-family zoning to protect single-family neighborhoods and focused density in downtown and areas referred to as “nodes” and “noodles.” These urban centers and main corridors included narrow strips of multi-family and commercial zoning.

One year after the adoption of the Comprehensive Plan, the zoning code was rewritten, replacing the former A2.5 (Apartment) zone with the new R2.5 zone. The R2.5 zone allowed similar density to the A2.5 zone but was categorized as single-family zoning and limited to houses and attached houses.¹⁹ The code also changed zoning in large swaths of inner Southeast from A2 (Apartment) zone to R5, a lower density single family zoning designation than R2.5.

Community Plans and Neighborhood Power Dynamics

Building on Senate Bill 100, Metro Council and Portland City Council adopted the 2040 Metro Growth Concept in 1995. The region-wide growth plan established regional policy to prevent urban sprawl into surrounding forests and farmland. Instead, it focused most of the expected growth inside the region’s urban growth boundary or UGB. The concept called for increased density in centers and corridors and directed Portland and the region’s other local jurisdictions to meet projected growth goals.

In 1994, Portland City Council adopted the Community and Neighborhood Planning Program to address issues that emerged after the adoption of the 1980 Comprehensive Plan and to manage growth and increased density in the city. The program signaled the first potential to shift away from the City’s 70-year planning practice of systematically increasing the area zoned single-family and instead to begin expanding multi-family zoning. Plans were set to be completed by 2005 in the following eight Community Planning Areas: Central City, Albina, Outer Southeast, Southwest, Inner Southeast, Peninsula area, Northwest Portland, and Northeast Portland. The strategy involved staggering the plans and completing them periodically and systematically. The program included a list of benchmarks to ensure consistency across community plans. However, land use was treated unequally in different parts of the city, resulting in inequitable outcomes.

¹⁸ Alan Webber, Population Strategy, (City of Portland, 1977) [memorandum].

¹⁹ City of Portland Bureau of Planning and Sustainability, “Better Housing by Design Assessment Report, Appendix: Zoning History” (Bureau of Planning and Sustainability, December 2016), 67, <https://www.portlandoregon.gov/bps/article/623006>.

Albina Community Plan (1993)

The first community plan study area outside of the Central City consisted of large parts of inner North/Northeast Portland, where the African American community had historically resided. This included the neighborhoods of Kenton, Arbor Lodge, Piedmont, Humboldt, Overlook, Boise, Eliot, Woodlawn, Concordia, Sabin, Irvington, and Vernon. A history of redlining, predatory lending, and other racist practices had led to vacant homes and businesses and disinvestment in the area. “Economic stagnation, population loss, housing abandonment, crack cocaine, gang warfare, redlining, and speculation were all part of the scene,” notes Karen Gibson in “Bleeding Albina: A History of Community Disinvestment.”²⁰

Through the Albina Community Plan, the City tried to address its prolonged disinvestment in the area by boosting economic development and bringing investment and improvements to Albina. This, in turn, provided grounds for the City to rezone significant portions of single-family residential to higher-density zoning to help meet growth goals in the name of revitalization. Major corridors such as N Interstate, N Vancouver and N Williams received some of the highest-density zoning (see map in Fig. 5). Many of the changes were suggested and supported by Irvington, Kenton, Eliot, and Arbor Lodge Neighborhood Associations as well as the North/Northeast Business Boosters.

The Albina Community Plan, however, set the stage for gentrification and displacement of African Americans years later. Gibson states, “The occupation of prime central city land in a region with an urban growth boundary and in a city aggressively seeking to capture population growth, coupled with an economic boom, resulted in very rapid gentrification and racial transition in the 1990s.” From 1990 to 2016, the Interstate Corridor Urban Renewal Area, which corresponds to a major portion of the Albina area, over 4,000 households of more than 10,000 African Americans were displaced from the neighborhood (see Fig. 6).

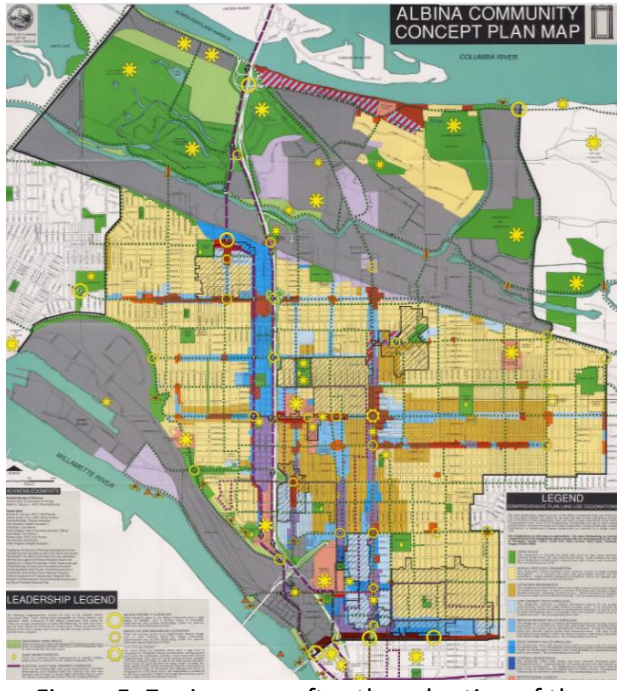


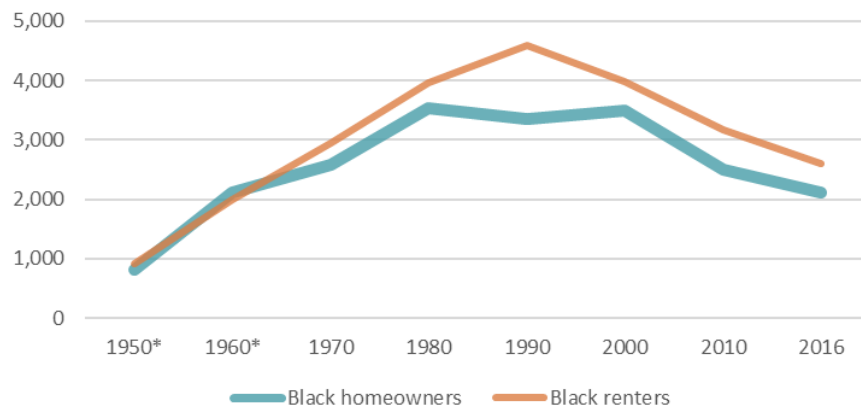
Figure 5. Zoning map after the adoption of the Albina Community Plan, 1993

²⁰ Karen Gibson, “Bleeding Albina: A History of Community Disinvestment, *Transforming Anthropology*, (American Anthropological Association, 2007).

RELATED PRACTICE: INTERSTATE CORRIDOR URBAN RENEWAL AREA PLAN

In 2000, the City’s Development Commission adopted the Interstate Corridor Urban Renewal Area (ICURA) Plan²¹. The ICURA Plan used the Albina Community Plan as its foundation, and the City directed investments along Interstate Ave in anticipation of a new MAX Yellow Line light rail line. With no more federal funding for urban renewal, the City used tax increment financing to fund the ICURA Plan, which depends on increased property tax revenue from new private investment. Two years later, the City adopted the Interstate Corridor Urban Renewal Area Housing Strategy, which aimed to provide a framework for housing goals in the area for the next 20 years²². Goal #6 of the plan specifically stated, “Increase the housing stability of existing residents and protect them from involuntary displacement caused by gentrification, increases in housing costs and loss of housing choices.” The plan also promised 2,000 new units of affordable housing in the area, but City Council prioritized local funding first for the Max line and failed to implement these anti-displacement goals and policies, further contributing to displacement of African Americans in the area. In 2018, 18 years after the adoption of the ICURA Plan, the City reported maintaining 1,516 regulated affordable rental units at or below 60% AMI. This number includes housing that existed before the creation of the URA.

NUMBER OF BLACK HOUSEHOLDS BY TENURE
INTERSTATE CORRIDOR URA, 1950 - 2016



* 1950 and 1960 censuses mark race of householder as either white or non-white.
Source: University of Minnesota, NHGIS. Portland BPS.

Figure 6. Number of Black Households by Tenure Over Time

Outer Southeast Community Plan (1996)

The Outer Southeast Community Plan process began partway through the Albina Community Plan process. The demographics of Outer Southeast differed from Albina in that the population was primarily

²¹ City of Portland, Portland Development Commission, *Interstate Corridor Urban Renewal Plan*, (August 2000), <https://prosperportland.us/wp-content/uploads/2016/07/Interstate-Corridor-Expansion-Exhibit-B-Amended-and-Restated-Interstate-Corridor-Plan.pdf>.

²² Portland Development Commission, *Interstate Corridor Urban Renewal Area Housing Strategy* (Portland Development Commission and Parametrix, Inc., March 13, 2002), 35, <https://scholarsbank.uoregon.edu/xmlui/handle/1794/9666>.

white, working-class families and retired people. Similar to Albina, significant upzoning occurred in outer Southeast Portland. The plan area included Brentwood-Darlington, Mt. Scott-Arleta, Foster-Powell, South Tabor, Lents, Montavilla, and recently annexed parts of East Portland, including Hazelwood, Powellhurst-Gilbert, and Centennial. Planners estimated 14,000 housing units were needed over the course of 20 years “to house both new and existing residents in smaller households.”²³ The plan aimed to “provide more housing opportunity” and rezoned areas along Powell Boulevard, 136th Avenue, and Holgate Boulevard to Low Density Multi-Dwelling (R2), strips on 122nd Avenue to Medium Density Multi-Dwelling (R1), areas to single-family R5 that were previously R7, and some additional areas to R2.5 (attached single-family housing). In Gateway, high-density housing and more intense commercial uses were encouraged.

The Plan also stated, “adopted zoning allots more land to attached single-family and low-density multifamily housing than the previous zoning because rowhouses, townhouses, and apartment housing are likely to be in greater demand.”²⁴ During the planning process, many residents expressed that they did not know about or understand the changes before they went into effect.

Compared to Albina, the geography of outer Southeast Portland was very suburban, and many felt it should be treated differently from more urban areas. The community felt that the higher density zoning was forced on them, and they were not happy with the result. It is estimated that “between 1996 and the mid-2000s, the area east of 82nd Avenue absorbed nearly 40% of Portland’s new housing units, mainly inexpensive multifamily apartments.”²⁵

Southwest Community Plan (2000)

In 1994, shortly after the adoption of the Albina Community Plan, the City began scoping the Southwest Community Plan. The study area was bordered by Sunset Highway/I-405 to the north, the Washington County line to the west, the Clackamas County line to the south, and the Willamette River to the east, for a total area of about 19.5 square miles. Southwest differs from other parts of the city in that it has many land constraints such as steep topography, watershed and environmental issues, and limited sidewalks. The initial theory was to allow density first, and then infrastructure would follow.

²³ City of Portland Bureau of Planning, Adopted Outer Southeast Community Plan (City of Portland, March 25, 1996), <https://www.portlandoregon.gov/bps/article/88069>

²⁴ City of Portland Bureau of Planning, *Adopted Outer Southeast Community Plan* (City of Portland, March 25, 1996), <https://www.portlandoregon.gov/bps/article/88069>

²⁵ Erin Goodling; Jamaal Green; and Nathan McClintock, “Uneven Development of the Sustainable City: Shifting Capital in Portland, Oregon” (Urban Studies and Planning Faculty Publications and Presentations, 2015), https://pdxscholar.library.pdx.edu/cgi/viewcontent.cgi?referer=&httpsredir=1&article=1106&context=usp_fac

In 1996, planners produced a draft zoning map for discussion that included rezoning large areas of lower density single-family zoning (R5, R7, and R10) to R2.5 single-family zoning (attached and small-lot housing). The community was enraged about the prospect of redeveloping single-family neighborhoods and increasing density without infrastructure improvements in place. Eventually, the draft zoning maps were scrapped, and a new process was created in which residents could propose their own zoning maps.

The final plan was drastically different from the initial plan. Much of the single-family zoning was preserved with some density added along main corridors, such as Barbur Boulevard, but the change was far less significant than the previous community plans (see Fig. 7).

The demographics and power dynamics of Southwest were also very different from those in Albina and Outer Southeast. Southwest residents tended to be well-educated, higher income, and typically white. They were also much more organized and well-resourced than Albina and Outer Southeast residents. And people in Southwest were more effective at using neighborhood associations as a tool for organizing at public hearings and other places for public participation.

Abandonment of the Inner Southeast Community Plan

In mid-1990s, the City started the Inner Southeast Community Plan. But in the wake of the Southwest Community Plan controversy, the scope was reduced to a series of neighborhood plans with little or no changes to the zoning map. The incompleteness of the Inner Southeast Community Plan is the primary reason that mixed-use corridors such as Belmont, Hawthorne, and Division are much narrower and lower density than what had been allowed along Martin Luther King, Jr. Boulevard, Williams Avenue, and Interstate Avenue, for instance. Inner Southeast had narrow bands of CS (commercial) zoning directly abutting R5 (single-family) zoning, while Williams Ave in Albina was zoned EX (employment) with R1 (multi-family) buffers. Much of inner Southeast was also left with its 1980 R5 (single-family) zoning with thin bands of commercial zoning, instead of changing to R1 (multi-family) zoning as was done in Albina. The incomplete cycle of community planning and disproportionate concentrations of density in Albina and Outer Southeast Portland contributed to focused change and displacement pressures in those areas.

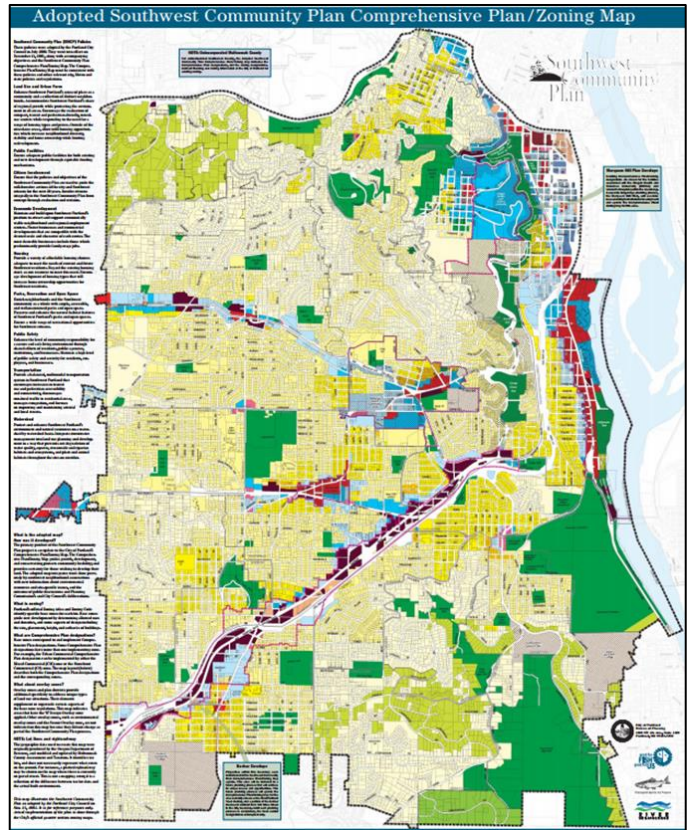


Figure 7. Adopted Southwest Community Plan Comprehensive Plan/Zoning map, 2001

Shift to Area Planning

After the Inner Southeast Community Plan was dropped, the City shifted from community planning to area planning, which would move more quickly and require fewer resources. Instead of broad geographies, area plans focused on targeted areas in centers and corridors (dubbed “hubs” and “spokes”), leading to more concentrated density in town centers such as St. Johns/Lombard and Hollywood/Sandy. The St. Johns-Lombard Plan, for example, upzoned properties in the Cathedral Park neighborhood. Industrial land adjacent to the Willamette River was changed to EX (mixed-use) zoning, parts of single-family residential zoning were upzoned to multi-family residential, and some residential zoning became commercial. This area was home to a diverse, working-class community, but the increase in density did little to increase the stability of African Americans over time. Between 2000 and 2016, the African American population decreased in Cathedral Park by 38 percent and in south St. Johns by 13 percent. This new planning approach also left a lot of single-family-zoning in less diverse neighborhoods untouched.

CURRENT ERA: EQUITY IN PLANNING

VisionPDX, the Portland Plan, and the 2035 Comprehensive Plan

In 2005, under Mayor Tom Potter, the City launched visionPDX,²⁶ an effort to engage community members, particularly those from underrepresented groups and communities, in developing a shared vision of Portland. VisionPDX was established to give the community a “place at the table” to consider the direction for Portland’s future. The most prominent values expressed were community connectedness and distinctiveness, equity and accessibility, and sustainability. The effort put forward the concept that the benefits and burdens of growth and change should be shared fairly among communities, and all residents and groups should be fully involved as equal partners in public decision-making.

In 2009, Mayor Sam Adams launched the Portland Plan, a strategic plan intended to translate visionPDX into specific policy directions and actions.²⁷ The Portland Plan established equity at the core of the City’s future planning work and that equitable access to opportunity is essential to Portland’s long-term success.

This new wave of thinking about equity in planning led to the development of new equity goals and policies in the 2035 Comprehensive Plan, which was adopted in 2016. Community activists championed the inclusion of policies to prevent displacement, increase fair housing, advance environmental justice, and correct past harms. These policies are currently in effect and have significant implications on the future of land use in Portland. For a list of these policies, see [Appendix A](#).

²⁶ City of Portland, VisionPDX (City of Portland, 2007), <https://www.portlandoregon.gov/bps/article/168876>.

²⁷ City of Portland, Portland Plan, (April 2012), <http://www.portlandonline.com/portlandplan/index.cfm?c=56527>.

Affirmatively Furthering Fair Housing

Portland's recent approach to fair housing

In 2011, the City of Portland, City of Gresham, and Multnomah County conducted a regional Analysis of Impediments to Fair Housing Choice (AI).²⁸ This is a federal requirement for jurisdictions every three to five years. It was done regionally because housing discrimination and racial segregation are regional issues and coordination is necessary.

The AI looked at fair housing complaints, demographic patterns, mortgage data, and zoning and land use policies to analyze patterns that are contributing to housing discrimination and segregation. For example, the AI examined the how single-family zoning and Portland Public School catchment areas have contributed to an overwhelmingly high white student body and reinforced racial and economic segregation at Alameda Elementary and Grant High School. The AI also showed that low-income residents and communities of color are more concentrated in areas with reduced access to transit, schools, grocery stores, sidewalks, and other indicators of opportunity. Another key finding indicated that “local zoning constraint and NIMBYism restrict inclusive housing production policies; existence of such policies may not be in the spirit of affirmatively furthering fair housing.”

One of the recommendations was to plan for multi-family housing to be near transportation, schools and employment to help “achieve the Housing and Urban Development goal of providing opportunities for inclusive patterns of housing occupancy for all persons.”

With the exception of one regulatory tool, Inclusionary Housing, the new practices informed by the AI have been housing programs and investments. Some include:

- The formation of the Fair Housing Advocacy Committee

DEFINITIONS: AFFIRMATIVELY FURTHERING FAIR HOUSING AND DISPARATE IMPACT

The Affirmatively Furthering Fair Housing (AFFH) Rule is a provision of the Fair Housing Act that provides a framework for states, counties, municipalities, and public housing agencies to more effectively further the Fair Housing Act. “Congress intended that HUD programs be used to expand housing choices and help make all neighborhoods places of opportunity, providing their residents with access to the community assets and resources they need to flourish. Unfortunately, too many jurisdictions have taken HUD funds but failed to fulfill their AFFH obligations. And for most of the 50 years since the passage of the Fair Housing Act, HUD has done little to correct this problem.”²⁹

Disparate Impact: Though the Fair Housing Act has been in effect for more than 50 years, policies and practices still, intentionally or unintentionally, keep some people out of housing they can afford simply because of who they are. Disparate Impact Theory was developed by HUD to challenge facially neutral policies and test whether they have a discriminatory effect. If a policy has a discriminatory effect, the policy must be changed so it is both fair and effective. If the policy has a legitimate reason behind it, and no other policy could achieve the same goal with a less discriminatory effect, then the policy stands.

²⁸ City of Portland; City of Gresham; and Multnomah County, “Fair Housing Plan: An Analysis of Impediments to Fair Housing Choice and the Strategies to Address Them” (Portland Housing Bureau, 2011), <https://www.portlandoregon.gov/phb/article/653184>

²⁹ U.S. Department of Housing and Urban Development, “AFFH Fact Sheet: The Duty to Affirmatively Further Fair Housing” (HUD, March 26, 2019), <https://www.huduser.gov/portal/sites/default/files/pdf/AFFH-Fact-Sheet.pdf>

- Annual State of Housing report, which breaks the affordability of neighborhoods out by racial demographics
- Preference policy for Northeast Portland
- Opportunity mapping, which is used to illustrate areas of Multnomah County where there is limited access to opportunity
- Landlord discrimination testing
- Increased investment in culturally specific providers of homeownership programs
- Housing Bond
- Creation of the Rental Services Commission and Rental Services Office
- Changes to Tax Exemption Programs

While the AI did look at a variety of racial disparities with complex root causes, much of the responsibility to address these disparities has fallen on the Portland Housing Bureau. The emphasis has mostly been on preventing discrimination in housing and making some targeted housing investments. Less emphasis has been placed on the disparate impacts of land use and infrastructure investments on communities of color.

National Context

In 2016, HUD and the U.S. Department of Justice (DOJ) released a Joint Statement titled State and Local Land Use Laws and Practices and the Application of the Fair Housing Act.³⁰ This document provides guidance on applying the Fair Housing Act and expands the scope to include zoning decisions. The new rule states, “a land use or zoning practice results in a discriminatory effect if it caused or predictably will cause a disparate impact on a group of persons or if it creates, increases, reinforces, or perpetuates segregated housing patterns because of a protected characteristic.”

Current Land Use and Demographic Conditions

Today, single-family zoning accounts for approximately 74% of the total land area where housing can be developed in Portland. Apartments and other types of multi-family housing can sometimes be found in neighborhoods currently zoned as single-family due to their previous multi-family zoning designations, including parts of Buckman, Kerns, Sunnyside, and other inner neighborhoods.

Since the 1920s, very little change has occurred in the original 15 single-family-zones. These neighborhoods have remained stable and demographically homogeneous with low levels of vulnerability to displacement and tend to be in the top two quintiles for white households (see Fig. 8 and 9). The boundaries also closely align with racially concentrated areas of privilege – areas with high concentrations of white and high-income people (see Fig. 10), also known as “Racially Concentrated Areas of Affluence.”³¹

³⁰ U.S. Department of Housing and Urban Development and U.S. Department of Justice, Joint Statement of the Department of Housing and Urban Development and the Department of Justice, State and Local Land Use Laws and Practices and the Application of the Fair Housing Act (DOJ, November 10, 2016), <https://www.justice.gov/opa/file/912366/download>

³¹ Edward G. Goetz, Tony Damiano, and Jason Hicks, “Racially Concentrated Areas of Affluence: A Preliminary Investigation” (University of Minnesota Humphrey School of Public Affairs), <http://www.cura.umn.edu/sites/cura.advantagelabs.com/files/publications/DRAFT-Racially-Concentrated-Areas-of-Affluence-A-Preliminary-Investigation.pdf>.

On the other hand, places such as inner North/Northeast Portland (including Albina) have changed drastically, with high household turnover, gentrification, and displacement of many African American residents and businesses. According to Professor Carl Abbott, “Portland’s very success in attracting well-educated residents to older neighborhoods has increased the pace of ‘gentrification,’ meaning the displacement of lower-income residents by people who can pay more for the same property. Low income groups are increasingly pushed from central neighborhoods into suburban fringe areas.”³² As a result, the “Black community has experienced a loss of place....This loss of place results in a strained connection to [the community’s] cultural history.”³³

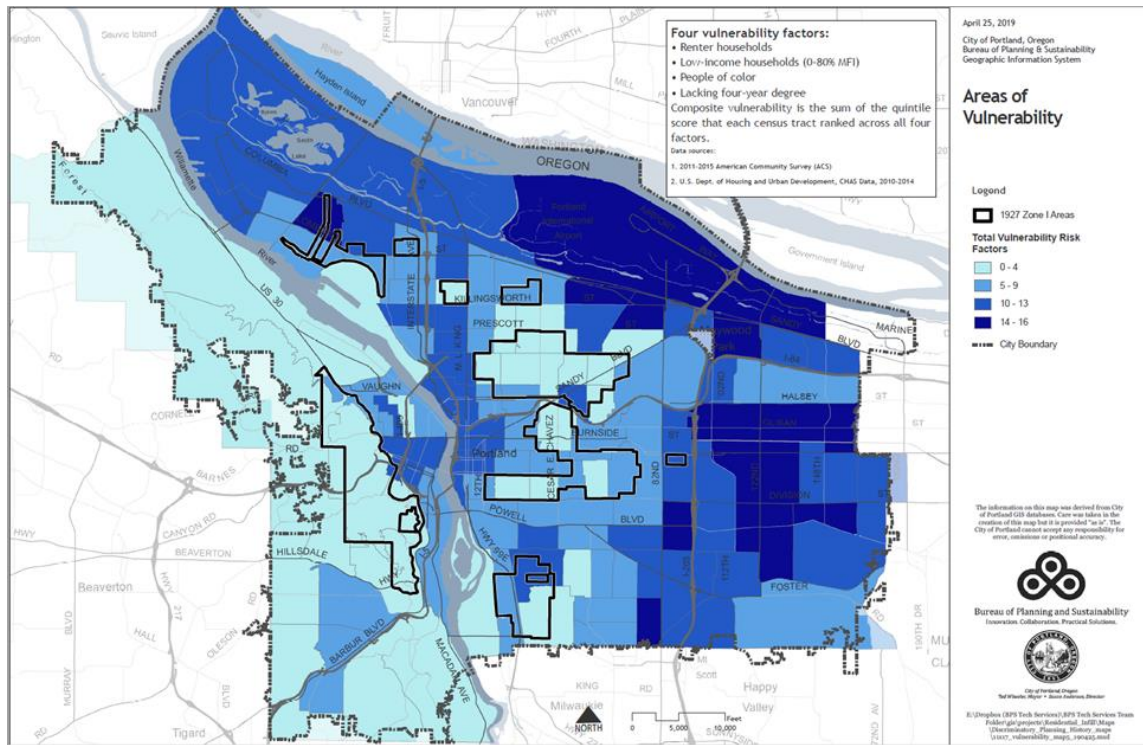


Figure 8. Areas of Vulnerability, 2019

³² Carl Abbott, “Planning a Sustainable Portland: A Digital Library for Local, Regional, and State Planning and Policy Documents” (Urban Studies and Planning Faculty Publications and Presentations, 2005), https://pdxscholar.library.pdx.edu/cgi/viewcontent.cgi?referer=&httpsredir=1&article=1105&context=usp_fac

³³ Portland African American Leadership Forum, The People’s Plan, (2017), 92. https://static1.squarespace.com/static/5a5412ec29f187985b36d74f/t/5a569fe9e2c483db35a2f3a4/1515626489571/PAALF+Peoples+Plan_2017_sm.pdf

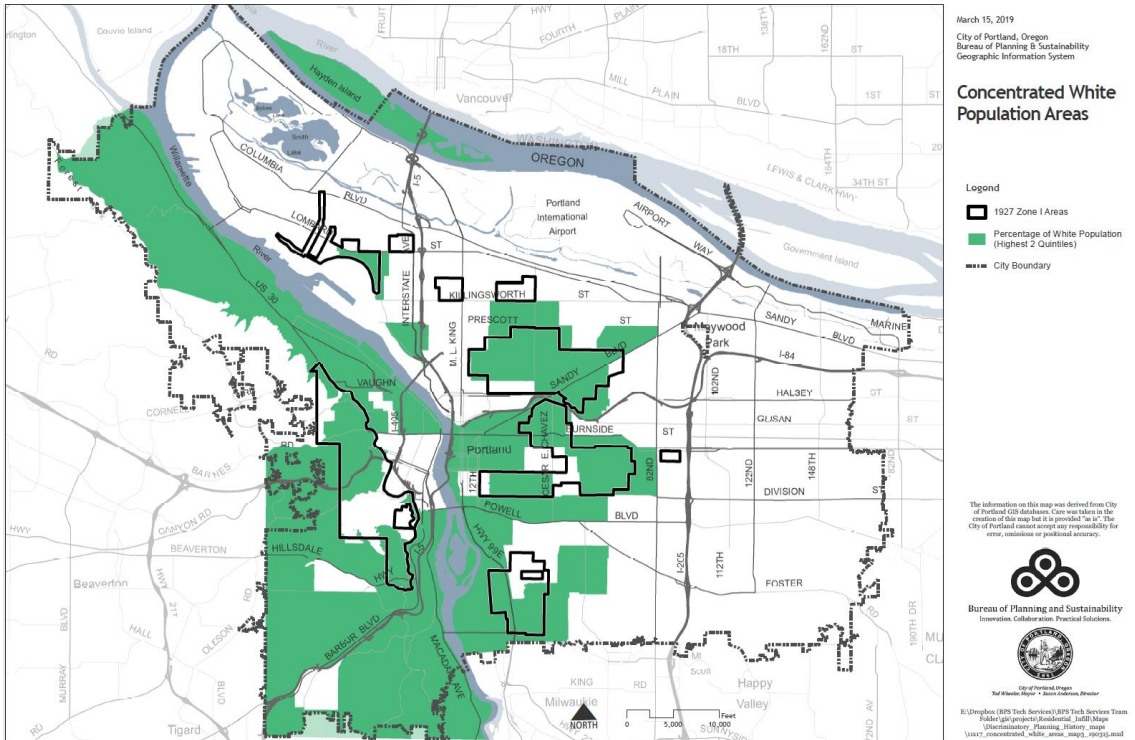


Figure 9. Map of Percentage of White Population, Highest Two Quintiles, 2019

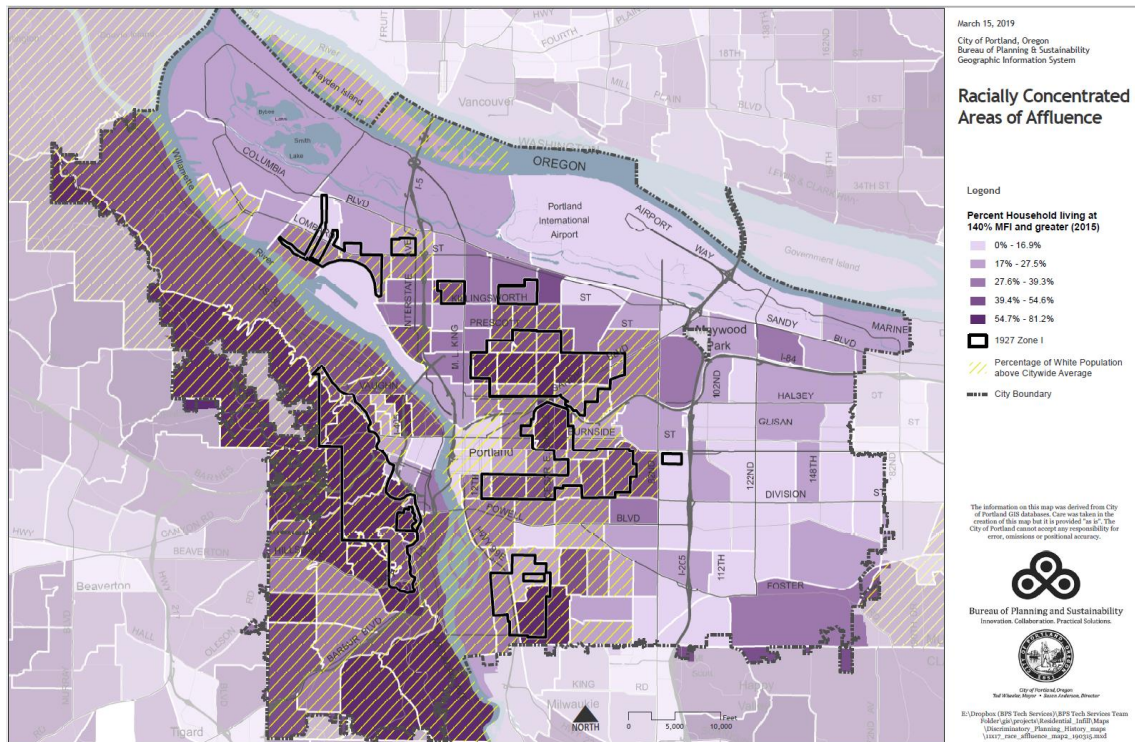
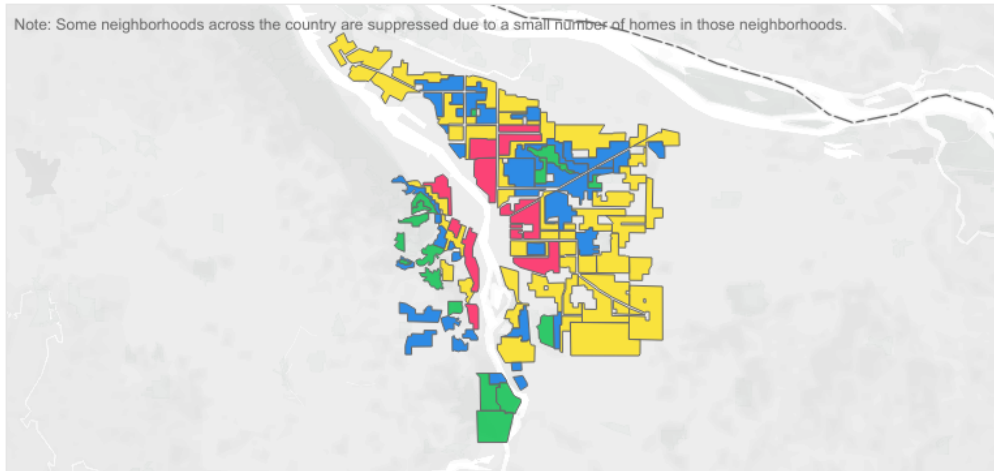


Figure 10. Map Racially Concentrated Areas of Affluence: Percentage of Households Living at 140% Median Family Income (MFI) and Percentage of White Population above Citywide Average, 2019

Home Values Still Lag in Most Redlined Neighborhoods

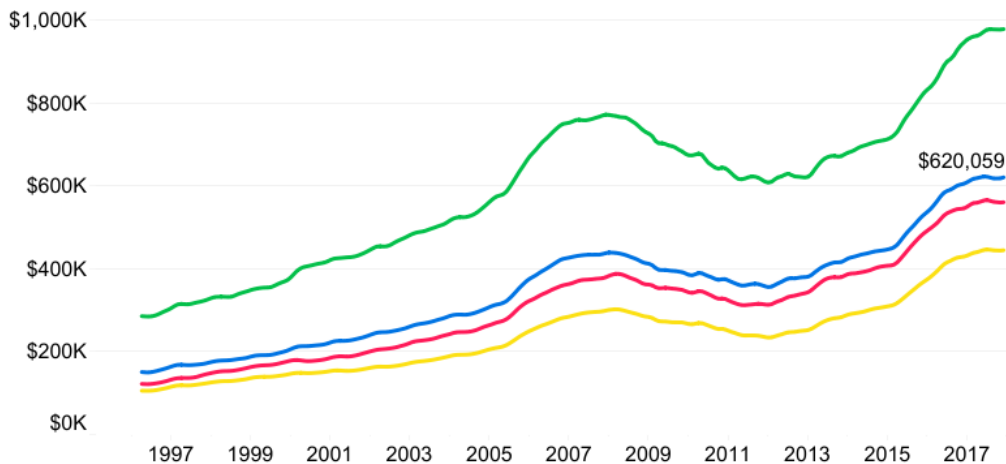
Areas the government designated **best**, **still desirable**, **definitely declining** and **hazardous** for mortgage lending

Choose Region:
Portland, OR



■ Best
 ■ Still Desirable
 ■ Definitely Declining
 ■ Hazardous

Median home values for areas the government designated **best**, **still desirable**, **definitely declining** and **hazardous** for mortgage lending



Source: Zillow median home values and data from Mapping Inequality (<https://dsl.richmond.edu/panorama/redlining>)

Figure 11. Median Home Values for areas previously categorized by the 1938 HOLC map

Previously greenlined areas have gained drastically higher median home values compared to other areas³⁴ (see Fig. 11). The data also show that median home values have increased more in previously redlined areas compared to previously yellow-lined areas; this can likely be explained by the revitalization and gentrification in those neighborhoods, especially in Albina, as well as their proximity to Central City.

³⁴ Sarah Mikhtarian, “Home Values Remain Low in Vast Majority of Formerly Redlined Neighborhoods” (Zillow, April 25, 2018), <https://www.zillow.com/research/home-values-redlined-areas-19674/>

White households have experienced inequitable benefits from homeownership. White households in single-family neighborhoods have accumulated wealth through rising home values, further contributing to racial disparities in wealth. In addition, higher value mortgage interest deductions exist in these more expensive, historically exclusive areas (see Fig. 12), which results in a greater federal subsidy for those who retain wealth in their homes than those who do not.

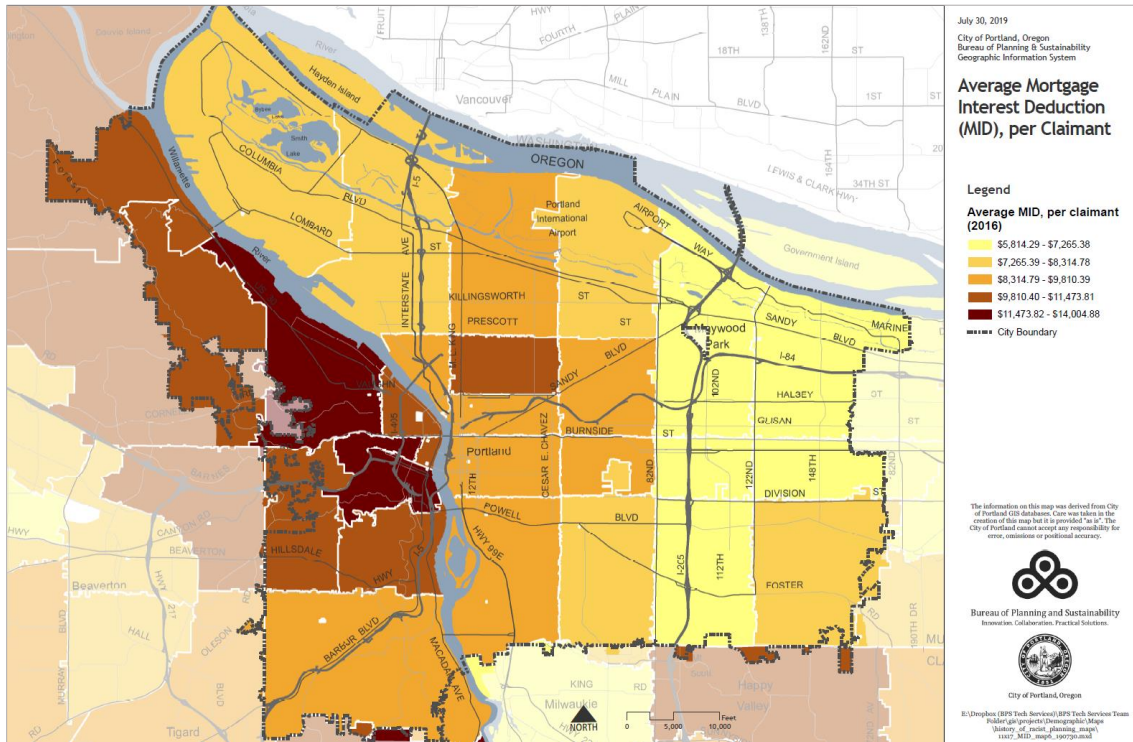


Figure 12. Average Mortgage Interest Deductions per Claimant, July 30, 2019

In places where households of color have had opportunities to own property, many have been targeted for predatory lending and are vulnerable to foreclosures. For example, Black Americans are three times more likely to be denied home loans than white Americans.³⁵ Low-income populations and people of color also tend to be concentrated in areas of low opportunity.^{36,37}

Residential racial segregation can also be observed in the Portland Public Schools district, where high-quality schools in West Portland, for instance, have a majority white student body compared to schools in other areas with majority students of color.³⁸

³⁵ Drew Desilver and Kristen Bialik, “Blacks and Hispanics face extra challenges in getting home loans (Pew Research Center, January 10, 2017), <http://www.pewresearch.org/fact-tank/2017/01/10/blacks-and-hispanics-face-extra-challenges-in-getting-home-loans/>.

³⁶ Portland Housing Bureau, “Opportunity Mapping” (March 26, 2019), <https://www.portlandoregon.gov/phb/index.cfm?&c=75175>

³⁷ Portland Housing Bureau, State of Housing in Portland, (December 2018), <https://www.portlandoregon.gov/phb/article/707182>

³⁸ Portland Public Schools, “Cohort Makeup by Race” (2017), https://www.pps.net/cms/lib/OR01913224/Centricity/Domain/207/By_School_and_Subgroup_at_a_Glance_2016-17.pdf.

SIGNIFICANCE

Some acts of Portland’s land use planning history have been conducted with discriminatory intent, while others have resulted in discriminatory impacts regardless of their intent. The effects of these planning practices and decisions include inequitable benefits for privileged white homeowners, such as land-based wealth, mortgage interest deductions, and other financial benefits. Meanwhile, people of color, particularly the African American community in Portland, have repeatedly been burdened, excluded, displaced, and otherwise harmed by explicit and implicit racial discrimination and segregation.

Historically exclusive neighborhoods that do not allow for more housing options to absorb a growing and changing population can increase gentrification pressures in other neighborhoods as housing demand spills over and increases housing costs. Current single-family zoning patterns uphold and reinforce past harmful practices of redlining, racial covenants, and other intentional racial segregation while prolonging the barriers to homeownership for people of color.

The City of Portland has a responsibility to affirmatively further fair housing by changing policies that have disparate impacts and instead intentionally create equitable outcomes. The City has also heard from the Black community in Portland that a key policy priority is to “Hold the City, County, and Metro accountable for the HUD mandate to Affirmatively Further Fair Housing by ending racial segregation from opportunity, providing community development and investment without displacement.”^{39,40}

Although deeper analysis and strategies are needed to advance racial equity and fair housing in neighborhoods across all of Portland, understanding this history can help policymakers make more educated decisions that will not repeat historical mistakes and instead work to undo past harms. Acknowledging the role the City has played in contributing to racial disparities is only the first step; we must take action to actively advance racial equity in planning.

³⁹ Portland African American Leadership Forum, The People’s Plan, (2017), 50.

https://static1.squarespace.com/static/5a5412ec29f187985b36d74f/t/5a569fe9e2c483db35a2f3a4/1515626489571/PAALF+Peoples+Plan_2017_sm.pdf

⁴⁰ Urban League of Portland, State of Black Oregon, (2015), 155. <https://ulpdx.org/wp-content/uploads/2015/05/State-Of-Black-Oregon-2015.pdf>

APPENDIX A: TIMELINE OF KEY POINTS IN PORTLAND'S RACIST PLANNING HISTORY

The following timeline shows important points in Portland's history of racist land use planning.

(Note: **Blue text** is the national context. All other dates are Portland-specific)

The Beginning of Exclusionary Zoning, 1900 to 1930

- Early 1900s Some of the first platted developments in Portland included covenants restricting certain uses and people of color from owning or living on those properties. These covenants functioned as the earliest form of privatized zoning.
- 1912 The Greater Portland Plan of Edward H. Bennett assumed that Portland's population would reach two million people by 1940.
- 1917 The Supreme Court in *Buchanan v. Warley* overturned racial zoning ordinances.
- 1924 Portland's first zoning code included few areas zoned single-family.

Expansion of Single-Family Zoning, 1930s to 1980s

- 1937 The Home Owners Loan Corporation categorized Portland's neighborhoods by desirability including racial homogeneity, a process known as "redlining"
- 1943 Robert Moses' Portland Improvement Plan recommended expanding single-family residential zoning and preventing further "encroachment" of multi-dwelling housing.
- 1948 Racially restrictive covenants were declared unenforceable by the Supreme Court in *Shelley v. Kramer*.
- 1950s The start of urban renewal
- 1951 A major zoning code update rezoned large areas of multi-family zoning to single-family.
- 1959 A zoning code update expanded single-family zoning to almost all residential areas of Portland.
- 1968 The Fair Housing Act was enacted to prohibit housing discrimination and provide grounds for correcting historical inequities.
- 1973 Senate Bill 100 created Oregon's land use planning program.
- 1975 The Northwest District Plan aimed to preserve historic housing and places of "family" residence.
- 1977 Portland adopted The Population Strategy detailing how to prioritize policy and investments to attract employed, middle-class families from the suburbs.
- 1977 The Community Reinvestment Act was created to help undo the effects of previous redlining.

Contemporary Planning, 1980 to Early 2000s

- 1980 Portland’s first Comprehensive Plan was developed around the concept of “nodes and noodles,” which involved concentrating density along main roads and town centers while leaving most single-family residential areas untouched.
- 1981 A zoning code update carried out the policies of the 1980 Comprehensive Plan to protect single-family homes.
- 1981–2000 The annexation of East Portland occurred.
- 1991 A zoning code update mapped new multi-dwelling zoning disproportionately in the recently annexed East Portland.
- 1993 The Albina Community Plan was adopted.
- 1996 The Outer Southeast Community Plan was adopted.
- 2000 The Southwest Community Plan’s vision, policies, and objectives were adopted after the rest of the planning process was abandoned.
- 2000 Adoption of the Interstate Corridor Urban Renewal Area (ICURA) Plan

Equity in Planning, Current Era

- 2005 VisionPDX was adopted.
- 2009 Portland Plan was adopted with an Equity Framework.
- 2011 Analysis of Impediments to Fair Housing Choice
- 2016 Adoption of the 2035 Comprehensive Plan and new equity goals and anti-displacement policies

APPENDIX B: EQUITY POLICIES IN THE 2035 COMPREHENSIVE PLAN

Below is a table of adopted equity goals and policies in the 2035 Comprehensive Plan. Highlighted sections are policies directly related to Fair Housing.

Comp Plan Policies	Full Policy Language in Adopted Comprehensive Plan
GUIDING PRINCIPLES	
Equity	Promote equity and environmental justice by reducing disparities, minimizing burdens, extending community benefits, increasing the amount of affordable housing, affirmatively furthering fair housing, proactively fighting displacement, and improving socio-economic opportunities for under-served and under-represented populations. Intentionally engage under-served and underrepresented populations in decisions that affect them. Specifically recognize, address and prevent repetition of the injustices suffered by communities of color throughout Portland’s history.
CHAPTER 2 - Community Involvement	
Goal 2.B: Social justice and equity	The City of Portland seeks social justice by expanding choice and opportunity for all community members, recognizing a special responsibility to identify and engage, as genuine partners, under-served and under-represented communities in planning, investment, implementation, and enforcement processes, particularly those with potential to be adversely affected by the results of decisions. The City actively works to improve its planning and investment-related decisions to achieve equitable distribution of burdens and benefits and address past injustices.
Goal 2.C: Value community wisdom and participation	Portland values and encourages community and civic participation. The City seeks and considers community wisdom and diverse cultural perspectives, and integrates them with technical analysis, to strengthen land use decisions.
Goal 2.D: Transparency and accountability	City planning and investment decision-making processes are clear, open, and documented. Through these processes a diverse range of community interests are heard and balanced. The City makes it clear to the community who is responsible for making decisions and how community input is taken into account. Accountability includes monitoring and reporting outcomes.
Goal 2.E: Meaningful participation	Community members have meaningful opportunities to participate in and influence all stages of planning and decision making. Public processes engage the full diversity of affected community members, including under-served and under-represented individuals and communities. The City will seek and facilitate the involvement of those potentially affected by planning and decision making.
Goal 2.F: Accessible and effective participation	City planning and investment decision-making processes are designed to be accessible and effective, and responsive to the needs of all communities and cultures. The City draws from acknowledged best practices and uses a wide variety of tools, including those developed and recommended by under-served and under-represented

	communities, to promote inclusive, collaborative, culturally-responsive, and robust community involvement.
Policy 2.3: Environmental Justice - Extend benefits	Ensure plans and investments promote environmental justice by extending the community benefits associated with environmental assets, land use, and public investments to communities of color, low-income populations, and other under-served or under-represented groups impacted by the decision. Maximize economic, cultural, political, and environmental benefits through ongoing partnerships.
Policy 2.4: Environmental Justice - Eliminate burdens	Ensure plans and investments eliminate associated disproportionate burdens (e.g. adverse environmental, economic, or community impacts) for communities of color, low-income populations, and other under-served or under-represented groups impacted by the decision.
2.4.a	Minimize or mitigate disproportionate burdens in cases where they cannot be eliminated.
2.4.b	Use plans and investments to address disproportionate burdens of previous decisions.
CHAPTER 3 - Urban Form	
Goal 3.A: A city designed for people	Portland’s built environment is designed to serve the needs and aspirations of all Portlanders, promoting prosperity, health, equity, and resiliency. New development, redevelopment, and public investments reduce disparities and encourage social interaction to create a healthy connected city.
Policy 3.3: Equitable development	Guide development, growth, and public facility investment to reduce disparities; encourage equitable access to opportunities, mitigate the impacts of development on income disparity, displacement and housing affordability; and produce positive outcomes for all Portlanders.
3.3.a	Anticipate, avoid, reduce, and mitigate negative public facility and development impacts, especially where those impacts inequitably burden communities of color, under-served and under-represented communities, and other vulnerable populations.
3.3.b	Make needed investments in areas that are deficient in public facilities to reduce disparities and increase equity. Accompany these investments with proactive measures to avoid displacement and increase affordable housing.
3.3.c	Encourage use of plans, agreements, incentives, and other tools to promote equitable outcomes from development projects that benefit from public financial assistance.
3.3.d	Incorporate requirements into the Zoning Code to provide public and community benefits as a condition for development projects to receive increased development allowances.
3.3.e	When private property value is increased by public plans and investments, require development to address or mitigate displacement impacts and impacts on housing affordability, in ways that are related and roughly proportional to these impacts.

3.3.f	Coordinate housing, economic development, and public facility plans and investments to create an integrated community development approach to restore communities impacted by past decisions. <i>See Policy 5.18.</i>
3.3.g	Encourage developers to engage directly with a broad range of impacted communities to identify potential impacts of private development projects, develop mitigation measures, and provide community benefits to address adverse impacts.
Policy 3.9: Growth and development	Evaluate the potential impacts of planning and investment decisions, significant new infrastructure, and significant new development on the physical characteristics of neighborhoods and their residents, particularly under-served and under-represented communities, with particular attention to displacement and affordability impacts. Identify and implement strategies to mitigate the anticipated impacts. <i>More detailed policies are in Chapter 5: Housing.</i>
CHAPTER 5 - Housing	
Policy 5.6: Middle housing	Enable and encourage development of middle housing. This includes multi-unit or clustered residential buildings that provide relatively smaller, less expensive units; more units; and a scale transition between the core of the mixed use center and surrounding single family areas. Where appropriate, apply zoning that would allow this within a quarter mile of designated centers, corridors with frequent service transit, high capacity transit stations, and within the Inner Ring around the Central City.
Policy 5.10: Coordinate with fair housing programs	Foster inclusive communities, overcome disparities in access to community assets, and enhance housing choice for people in protected classes throughout the city by coordinating plans and investments to affirmatively further fair housing.
Policy 5.11: Remove barriers	Remove potential regulatory barriers to housing choice for people in protected classes to ensure freedom of choice in housing type, tenure, and location.
Policy 5.12: Impact analysis	Evaluate plans and investments, significant new infrastructure, and significant new development to identify potential disparate impacts on housing choice, access, and affordability for protected classes and low income households. Identify and implement strategies to mitigate the anticipated impacts.
Policy 5.13: Housing stability	Coordinate plans and investments with programs that prevent avoidable, involuntary evictions and foreclosures.
Policy 5.14: Preserve communities	Encourage plans and investments to protect and/or restore the socioeconomic diversity and cultural stability of established communities.
Policy 5.15: Gentrification/displacement risk	Evaluate plans and investments, significant new infrastructure, and significant new development for the potential to increase housing costs for, or cause displacement of communities of color, low- and moderate-income households, and renters. Identify and implement strategies to mitigate the anticipated impacts.

Policy 5.16: Involuntary displacement	When plans and investments are expected to create neighborhood change, limit the involuntary displacement of those who are under-served and under-represented. Use public investments and programs, and coordinate with nonprofit housing organizations (such as land trusts and housing providers) to create permanently-affordable housing and to mitigate the impacts of market pressures that cause involuntary displacement.
Policy 5.17: Land banking	Support and coordinate with community organizations to hold land in reserve for affordable housing, as an anti-displacement tool, and for other community development purposes.
Policy 5.18: Rebuild communities	Coordinate plans and investments with programs that enable communities impacted by involuntary displacement to maintain social and cultural connections, and re-establish a stable presence and participation in the impacted neighborhoods.
Policy 5.26: Regulated affordable housing target	Strive to produce and fund at least 10,000 new regulated affordable housing units citywide by 2035 that will be affordable to households in the 0-80 percent MFI bracket.
Policy 5.27: Funding plan	Encourage development of financial or regulatory mechanisms to achieve the regulated affordable housing target set forth for 2035.
Policy 5.29: Permanently affordable housing	Increase the supply of permanently affordable housing, including both rental and homeownership opportunities.
Policy 5.30: Housing cost burden	Evaluate plans and investments for their impact on household cost, and consider ways to reduce the combined cost of housing, utilities, and/or transportation. Encourage energy-efficiency investments to reduce overall housing costs.
Policy 5.31: Household prosperity	Facilitate expanding the variety of types and sizes of affordable housing units, and do so in locations that provide low-income households with greater access to convenient transit and transportation, education and training opportunities, the Central City, industrial districts, and other employment areas.
Policy 5.35: Inclusionary housing	Use inclusionary zoning and other regulatory tools to effectively link the production of affordable housing to the production of market-rate housing. Work to remove regulatory barriers that prevent the use of such tools.
Policy 5.37: Mobile home parks	Encourage preservation of mobile home parks as a low/moderate-income housing option. Evaluate plans and investments for potential redevelopment pressures on existing mobile home parks and impacts on park residents and protect this low/moderate-income housing option. Facilitate replacement and alteration of manufactured homes within an existing mobile home park.
Policy 5.54: Renter protections	Enhance renter health, safety, and stability through education, expansion of enhanced inspections, and support of regulations and incentives that protect tenants and prevent involuntary displacement.

CHAPTER 6 - Economic development	
Policy 6.27: Income self-sufficiency	Expand access to self-sufficient wage levels and career ladders for low-income people by maintaining an adequate and viable supply of employment land and public facilities to support and expand opportunities in Portland for middle- and high-wage jobs that do not require a 4-year college degree.
6.27.a.	Support the role of industrial districts as a leading source of middle-wage jobs that do not require a 4-year college degree and as a major source of wage-disparity reduction for under-served and under-represented communities.
6.27.b.	Evaluate and limit negative impacts of plans and investments on middle and high wage job creation and retention.
Policy 6.28: East Portland job growth	Improve opportunities for East Portland to grow as a business destination and source of living wage jobs.
Policy 6.29: Poverty reduction	Encourage investment in, and alignment of, poverty-reduction efforts that address economic development, land use, transportation, housing, social services, public health, community development, and workforce development.
Policy 6.30: Disparity reduction	Encourage investment in, and alignment of, public efforts to reduce racial, ethnic, and disability-related disparities in income and employment opportunity.
Policy 6.31: Minority-owned, woman-owned and emerging small business (MWESB) assistance	Ensure that plans and investments improve access to contracting opportunities for minority-owned, woman-owned, and emerging small businesses.
Policy 6.32: Urban Renewal plans	Encourage urban renewal plans to primarily benefit existing residents and businesses within the urban renewal area through: <ul style="list-style-type: none"> • Revitalization of neighborhoods. • Expansion of housing choices. • Creation of business and job opportunities. • Provision of transportation linkages. • Protection of residents and businesses from the threats posed by gentrification and displacement. • The creation and enhancement of those features which improve the quality of life within the urban renewal area.
CHAPTER 8 - Public facilities and services	
Policy 8.22: Equitable service	Provide public facilities and services to alleviate service deficiencies and meet level-of-service standards for all Portlanders, including individuals, businesses, and property owners.
8.22.a.	In places that are not expected to grow significantly but have existing deficiencies, invest to reduce disparity and improve livability.
8.22.b.	In places that lack basic public facilities or services and also have significant growth potential, invest to enhance neighborhoods, fill gaps, maintain affordability, and accommodate growth.

8.22.c.	In places that are not expected to grow significantly and already have access to complete public facilities and services, invest primarily to maintain existing facilities and retain livability.
8.22.d.	In places that already have access to complete public facilities and services, but also have significant growth potential, invest to fill remaining gaps, maintain affordability, and accommodate growth.
Policy 8.32: Community benefits	Encourage providing additional community benefits with large public facility projects as appropriate to address environmental justice policies in Chapter 2: Community Involvement.