

Cully TIF District

Action Plan

September 2025 CLC Working DRAFT

Yellow sections will
be highlighted at
September CLC
meeting

Contents

- I. About the Plan
- II. Introduction
 - A. *District Plan Goals*
 - B. *District Context*
 - i. *District Demographics*
 - ii. *Housing Context*
 - iii. *Economic Development and Commercial Context*
 - iv. *Priority Communities*
 - v. *Developing Strategies and Outcomes: SOAR Analysis*
- III. Investing TIF resources in the Cully TIF District community
 - A. *Affordable Housing Priorities*
 - B. *Economic Development Priorities*
- IV. Practices and Policies
 - A. *Role of the CLC in Implementation*
 - B. *New Programs*
 - C. *Improving Outcomes*
 - D. *Non-TIF Resources*
- V. Attachments
 - A. *District Map*
 - B. *Glossary*
 - C. *Criteria for TIF Funds*

I. About this Plan

This Cully TIF Action Plan has been developed to guide the Portland Housing Bureau's (PHB) and Prosper Portland's investment of \$350 million in Tax Increment Financing (TIF) resources for economic development and affordable housing through 2030. All investments made must align with the goals, values and eligible projects identified in the Cully TIF District Plan (2022).

PHB and Prosper Portland developed this Action Plan in partnership with the Cully TIF Community Leadership Committee (CLC), informed by input from small businesses, area non-profits and service organizations, and community members who participated in CLC meetings, interviews, or community events. Engagement efforts built on recent engagement conducted as part of the multi-year District Plan development process. Action Plan engagement focused on whether or not investment priorities met community expectations, aligned with the Cully TIF District Plan, and took strategic steps to implement and make real some of those stated goals.

(Add a public engagement summary paragraph here, once complete)

The Cully TIF District Community Governance Charter established the CLC, the first City of Portland/Prosper Portland joint advisory body. Traditionally, affordable housing and economic development conversations have happened separately, and often with separate advisory bodies of experts. This new body reflects a desire from community to have holistic conversations and co-create more strategic solutions to combat displacement and foster inclusive growth. In collaboration with the CLC, discussions and plans for investment in both affordable housing and economic development are intended to operate together.

Over the five years for which this Action Plan provides guidance, the CLC may see opportunities to better achieve desired outcomes by making changes to priority allocations. The CLC will provide guidance through the annual budget process and may request changes to priority allocations for consideration through that process.

TIF resources are limited by state law to be used for the planning and construction of physical improvements. TIF funds must be invested within the boundary of the TIF District (Figure 1) and cannot be used to fund programs or initiatives such as business technical assistance (business planning, marketing, accounting, etc.) job training, employment or rental assistance. These programs and initiatives are important to support community stabilization and inclusive growth.

Sections IV.C and D of this Action Plan contains additional information about ongoing Prosper Portland, PHB and other City-funded work that support these critical programs that support and complement the objectives of this Action Plan but cannot legally be resourced with TIF dollars.

A Glossary of Terms in this report can be found in Attachment B.

II. Introduction

A. District Plan Goals

This Action Plan serves as an implementation tool for the Cully TIF District Plan. As such, the priorities of this Action Plan are consistent with the Vision and Goals of the Cully TIF District Plan. The Cully community's long-term vision for the area can be found in the TIF District Plan:

A place that provides a sense of belonging for its residents, and particularly for Priority Communities.

The vision describes a Cully with plentiful safe, affordable housing, thriving businesses, rewarding employment opportunities, safe and accessible transportation options, parks and open spaces, a clean and healthy environment, climate resiliency, with places and programs that reflect the cultural diversity of the plan area.

The numerous goals of the District Plan focus on preventing the displacement of vulnerable people, communities, businesses and community-based institutions by preserving existing opportunities for affordable housing and economic prosperity, while also creating new opportunities for current and future generations. The goals reflect a desire to ensure that current residents benefit from investment and neighborhood change, rather than be pushed out and replaced by it; that those most vulnerable play lead roles in decisions about investments, and that working together, we collectively develop and inspire a new model for TIF districts in Portland and beyond.

B. District Context

District Demographics:

According to the 2020 Census and ACS 2018–2023 data, the Cully TIF District is home to approximately 15,500 residents across tracts 74, 75, and 76. The neighborhood is one of Portland’s most racially and ethnically diverse, with more than 52% of residents identifying as people of color, including significant Latino (27%), Black/African American (12%), Native American (2%), and Asian/Pacific Islander (6%) populations. Nearly 30% of Cully residents are foreign-born, with Spanish being the most common language spoken at home other than English. Income disparities remain significant: median household income is \$52,000, compared to \$78,400 citywide, with nearly 25% of households living below the federal poverty line.

Cully TIF District Demographics

Indicator	Cully TIF District	Portland Citywide
Total Population	15500	635000
% People of Color	52%	29%
% Latino	27%	11%
% Black/African American	12%	6%
% Native American	2%	1%
%Asian/Pacific Islander	6%	8%
% Foreign Born Residents	30%	14%
Median Household Income	\$52,000	\$78,000
% Households Below Poverty	25%	12%

Housing Context:

Housing affordability pressures are acute in Cully. With 38% of households rent-burdened and 45% of renter households severely rent-burdened, displacement risks remain high. Median rents in the district rose 17% between 2018 and 2023, outpacing income growth. Manufactured home parks provide a critical source of naturally occurring affordable housing, yet residents face unique risks tied to aging infrastructure and limited protections against redevelopment. PHB programs under this Action Plan will focus on homeownership access, retention of existing owners, preservation of manufactured housing, and creation of new deeply affordable rental housing.

While Prosper Portland data highlights small business dynamics, PHB’s housing lens adds the connection between household stability and local economic resilience. Roughly 20% of Cully residents both live and work in the district, with many employed in small neighborhood-serving businesses. However, lower-than-average wages (\$61,350 vs. \$79,000 citywide) constrain housing options, increasing reliance on

cost-burdened rental housing. Aligning economic development with affordable housing strategies will be key to stabilizing Cully families and preventing displacement.

Cully Housing Trends: 2018-2023

Year	Median Rent	% Rent Burdened	% Rent Burdened Renters
2018	\$1,100	36%	42%
2019	\$1,150	37%	43%
2020	\$1,200	37%	44%
2021	\$1,250	38%	45%
2022	\$1,275	38%	45%
2023	\$1,290	38%	45%

Economic and Commercial Context:

The Cully TIF District employs 4,458 employees at 668 different businesses. There are 442 small businesses in the district, employing roughly 60% of Cully workers, or roughly 2,700 employees.

While citywide, the average payroll is \$79,000, average payroll for all employment in Cully is \$61,350.

Jobs across the district are diverse: the largest employment by sector is Healthcare (29%), followed by Wholesale Trade (24%), Retail (16%), Transportation and Warehousing (16%) and Manufacturing (15%). Major employers in the district include Albertson's, Apex Anodizing, Northside Ford Truck Sales, Fire on the Mountain, Portland Disposal & Recycling and Industrial Tire Service.

While employment areas exist in many areas of the district, and many of the larger employers can be found in the industrial area, about one-third of the district's employment is located along two key neighborhood commercial corridors: NE 42nd Avenue and Cully Boulevard. Both of these corridors provide goods and services that support Cully's diverse needs, and both have room to grow, with underutilized and underdeveloped sites, and vacant sites, particularly on Cully Boulevard.

Payroll & Small Business Data

Total payroll: \$165 million

Average payroll: \$61,350

small businesses (1-49 employees): 442

small business employees: 2,688

% of workers employed by small business: 60%

Priority Communities

The Cully TIF District Plan takes a targeted universalism approach, the idea being that to move an entire community closer to the goals of the plan, investment must be focused on those individuals who are farthest from those goals. Specifically, the Cully TIF Plan determined to focus investments on those who are most vulnerable to displacement.

“Priority Communities,” as used in the Cully TIF District Plan, this Action Plan, and associated plan and investment materials, means the intended beneficiaries of the Cully TIF District, which are all people who are or may be vulnerable to exclusion from the District due to gentrification and displacement – or who have previously been displaced from the District.

Developing Strategies and Outcomes: SOAR Analysis

SOAR Analysis is a strategic planning tool focused on Strengths, Opportunities, Aspirations, and Results (SOAR). It encourages the development of goals that build upon a community’s existing strengths, identifies opportunities, names future aspirations, and defines measurable results to track progress. It’s a forward-looking and positive framework that helps communities develop a plan for achieving goals, drawing connections between current context and desired outcomes.

An initial draft SOAR analysis was developed by staff to reflect and carry forward conversations with community members held during the exploration phase of TIF District Development. The analysis aims to support and provide guidance for implementing District Plan goals, based on the district’s current strengths and opportunities, as identified by community members. This analysis was then vetted and refined through public engagement and by the CLC, to produce the table, below.

Add summary of highlights, CLC observations, etc - once SOAR is revised and finalized

Strengths	Opportunities
<p><i>What are our strengths? What are our greatest assets? What are we building on?</i></p> <ul style="list-style-type: none"> • Racially, culturally and socio-economically diverse community • Active & involved community members • Network of established non-profits with strong roots in the neighborhood • NPNs with strong relationships, experience and positive track record working with small businesses along 42nd and Cully Blvd • Public attention; lots of political will to see success • Significant, recent new affordable housing development; multiple manufactured housing parks that offer affordable alternative to traditional rental housing • Cully is seen as an area for innovation: it is often selected to pilot programs/products (e.g., sidewalk pilot; ADU/cluster housing) 	<p><i>What are the opportunities? What potential do we see or recognize?</i></p> <ul style="list-style-type: none"> • Two distinct commercial corridors with unique market conditions; both with room for significant employment growth • Proximity to industrial area jobs • Proximity to Portland Community College (PCC); workforce training and navigation • Significant number of larger, vacant/underutilized lots, particularly along Cully Blvd. • New TriMet 72 BRT Terminus slated for development near the Cully triangle
Aspirations	Results
<p><i>What do we care deeply about? What are our stakeholders asking for?</i></p> <ul style="list-style-type: none"> • Community leadership • Stabilize residents and businesses to maintain continuity • Provide opportunities for previously displaced residents and businesses to return • Provide a sense of belonging for all residents • Support wealth-building, particularly for Priority Communities, for long-term resilience • Solidarity with similar community-led efforts 	<p><i>How do we know we're succeeding? What are the rewards from achieving results?</i></p> <ul style="list-style-type: none"> • Number of homeowners retained/created with TIF investments • Number of existing businesses retained, returned or expanded; # culturally specific businesses supported • Number of businesses/employees on commercial corridors • Number of commercial properties purchased, redeveloped or improved • Number of nonprofits supported to serve community • Number community members participating in education/resource workshops

III. INVESTING TIF RESOURCES IN THE CULLY TIF DISTRICT COMMUNITY

A. AFFORDABLE HOUSING PRIORITIES

1. Support Creation of First-Time Homebuyers

Expand pathways to homeownership for low- and moderate-income households, by investing in financial education, down payment assistance, and affordable homeownership opportunities. This priority provides long-term housing stability for Cully residents.

Provide Down Payment Assistance loans (amount still being analyzed) +/- \$100K

- a. *No interest, no payment silent second mortgage*
- b. *A minimum of 10% is required to go towards home improvement – prioritizing health and safety improvements*
- c. *Loans are forgivable beginning at year 15 of owner-occupied ownership, 50% forgiven, 3% per year forgiven thereafter until year 30, remaining balance forgiven.*

Provide subsidy to create new permanently affordable homeownership units - \$150K per unit (2025 subsidy)

- a. *Units will be developed within a land trust model through a Notice of Funding Availability*
- b. *Depending upon the developer, units will sell to buyers at or below 80% AMI.*

2. Support Retention of Existing Homeowners to Prevent Displacement

Stabilize vulnerable homeowners by investing in programs that prevent foreclosure, support critical home repairs, or other retention resources. This priority is focused on preserving generational wealth and reducing displacement pressures in Cully.

Provide home repair grants up to \$10K

- a. *Grants will be managed through contracts with community partners: Habitat, PCRI, CEP, AAAH, Hacienda*
- b. *Grants are to be utilized primarily for health/safety, ADA improvements or to assist with repairs associated with fines or liens from the City.*
- c. *Only one grant per year per household.*

Provide Home repair loans up to \$40K

- a. *The loan program is managed through PHB, a second mortgage lien will be placed on the home.*

- b. *Loans are zero payments, zero interest.*
- c. *Owners must have at least \$40K equity in their home, owners with reverse mortgages are not currently eligible for this program.*
- d. *Home repair loans are forgivable at year 15.*

3. Support Development of Affordable Rental Housing (up to 60% AMI)

Facilitate the development of deeply affordable rental housing that serves households earning up to 60% of the Area Median Income (AMI). This includes prioritizing projects led by community-based developers and those that advance long-term affordability to meet the needs of cost-burdened renters in Cully.

PHB will award funds to support development of affordable rental units through a Notice of Funding Availability (NOFA).

- a. *Typical subsidy is between \$150K to \$200K (2025)*
- b. *PHB is a gap funder*

4. Support Mobile Home Residents to Prevent Displacement

Develop and implement programs that protect and stabilize mobile home park residents through unit improvements and pathways to resident or nonprofit ownership. This priority centers vulnerable people who rely on manufactured housing and aims to preserve affordability and community cohesion.

This program is to be developed by year three.

B. ECONOMIC DEVELOPMENT PRIORITIES

* Numbers reflect base 45% resource allocation to Prosper Portland

1. Support small businesses to remain, return, expand and grow in Cully.

Provide financing for existing small businesses to remain, return, expand, and grow in Cully through grants and loans:

NPN-administered Micro-grants: Provide grants up to \$20,000. No match required for grants of \$10,000 or less. For grants greater than \$10,000, provide 50% match for portion of grant above \$10,000. For example, a \$14,000 grant request would require a \$2,000 match from the applicant.

Prosperity Investment Program (PIP) Grants: Provide 75% percent matching grants of up to \$75,000 to assist property owners to improve and develop their assets. Up to \$25,000 may be used for project planning.

Small Business Loan Program: Offer small business loans to pay for PIP match and support larger tenant improvements.

- **Loan Amount:** \$25,000 to \$250,000
- **Interest Rate:** The interest rate will be determined by adding a margin to the current US Prime Rate. The amount of the margin will be based on the risk rating assigned to the loan in the underwriting process.
- **Fee:** Up to 2% of loan amount
- **Guarantee:** Personal and/or corporate guaranty from all principals and entities with a least a 20% ownership interest in the business
- **Must have at least two years of business operations and generate adequate net income to make monthly payments on all business debt**

Timing: Start immediately, annual allocation for five years.

Outcomes: 110 businesses served

Total 5-year Allocation:

\$4.765 million

2. Promote commercial property ownership and redevelopment to support stabilization, growth and wealth-building for Priority Communities.

Provide financing and support for commercial property owners to improve and develop their underutilized and underdeveloped commercial and residential properties.

Affordable Commercial Tenanting Program: Provide grants of up to \$300,000 to support commercial property owners to establish affordable commercial tenanting spaces in underutilized buildings.

Commercial Property Loan Program – Predevelopment, tenant improvements, construction financing and land acquisition

- **Loan Amount:** Depends on the specific program
- **Interest Rate:** Will be established at underwriting by adding the current Index value to the Risk and Impact adjusted Margin with a floor of 4.00% (example – a loan with a 10-year term will be priced using the current 10-year US Treasury Rate + a margin based on the risk rating).
- **Fee:** Up to 2% of loan amount
- **Borrower's Contribution:** Minimum 10% equity contribution
- **Collateral:** Deed of trust, assignment of rents, and security agreement recorded against the subject real property.
- **Guarantee:** Personal and/or corporate guaranty from all principals and entities with 20% ownership interest in the property.
- Must provide project proforma, construction budget, proof of equity injection and other project and guarantor information for underwriting of request

Timing: Start immediately. For loans, prioritize predevelopment loans in years 1 and 2. Starting in year 3, explore land acquisition opportunities.

Outcomes: 8 businesses served

Total 5-year Allocation:

\$6.690 million

3. Support cultural and community assets that promote healthy, complete and resilient neighborhoods while providing a sense of belonging for all residents of Cully's many different communities.

Build community prosperity by supporting the growth, development, and sustainability of key community-based organizations that drive economic development outcomes and serve Priority Communities.

Community Livability Grants of up to \$300,000

Timing: Start in year 2 and build to an annual allocation.

Outcomes: 10 non-profits served

Total 5-year Allocation:

\$1.200 million

IV. PRACTICES AND POLICIES

A. Role of the CLC in Implementation

The CLC was established by the Community Governance Charter, adopted as part of the Cully TIF District Plan. The Committee's purpose is to advise City staff, the Directors of Prosper Portland and PHB, Commissioners in-Charge, the Portland City Council ("City Council") and the Prosper Portland Board of Commissioners ("Board") on the implementation of the TIF Plan by providing essential guidance, public recommendations, and oversight of the City of Portland's and Prosper Portland's implementation of the TIF Plan. As the Committee will advise City Council and the Board directly on certain decisions, it is a public body pursuant to ORS Chapter 192.

B. New Programs

Over the life of the district, as contexts change, needs are voiced, and new needs surface, requests for new PHB or Prosper Portland programs may emerge. The development of new programs may or may not require additional staffing costs and will often require a year or more to establish. In this Action Planning cycle, a desire to explore two new PHB programs was voiced by the CLC:

- Developing a program to assist residents and property owners of manufactured home parks; and
- Developing a rental repair program

C. Improving Outcomes

1. Work with lenders and community stakeholders to assess whether Portland Housing Bureau's and Prosper Portland's financial tools need modifications to achieve greater access to capital among Priority Community members. Strive to reduce and eliminate barriers.
2. Pair PHB and Prosper Portland loans with ongoing education, support and business technical assistance.
3. Improve marketing and outreach to Priority Communities.
4. Proactively work with private and non-profit lenders and foundations to discuss ways to effectively partner to leverage TIF funding to achieve intended wealth creation goals.
5. Work proactively with foundations and public partners to identify partnerships that can leverage the reach of TIF investments and provide resources for critical non-TIF initiatives.

D. Non-TIF Resources

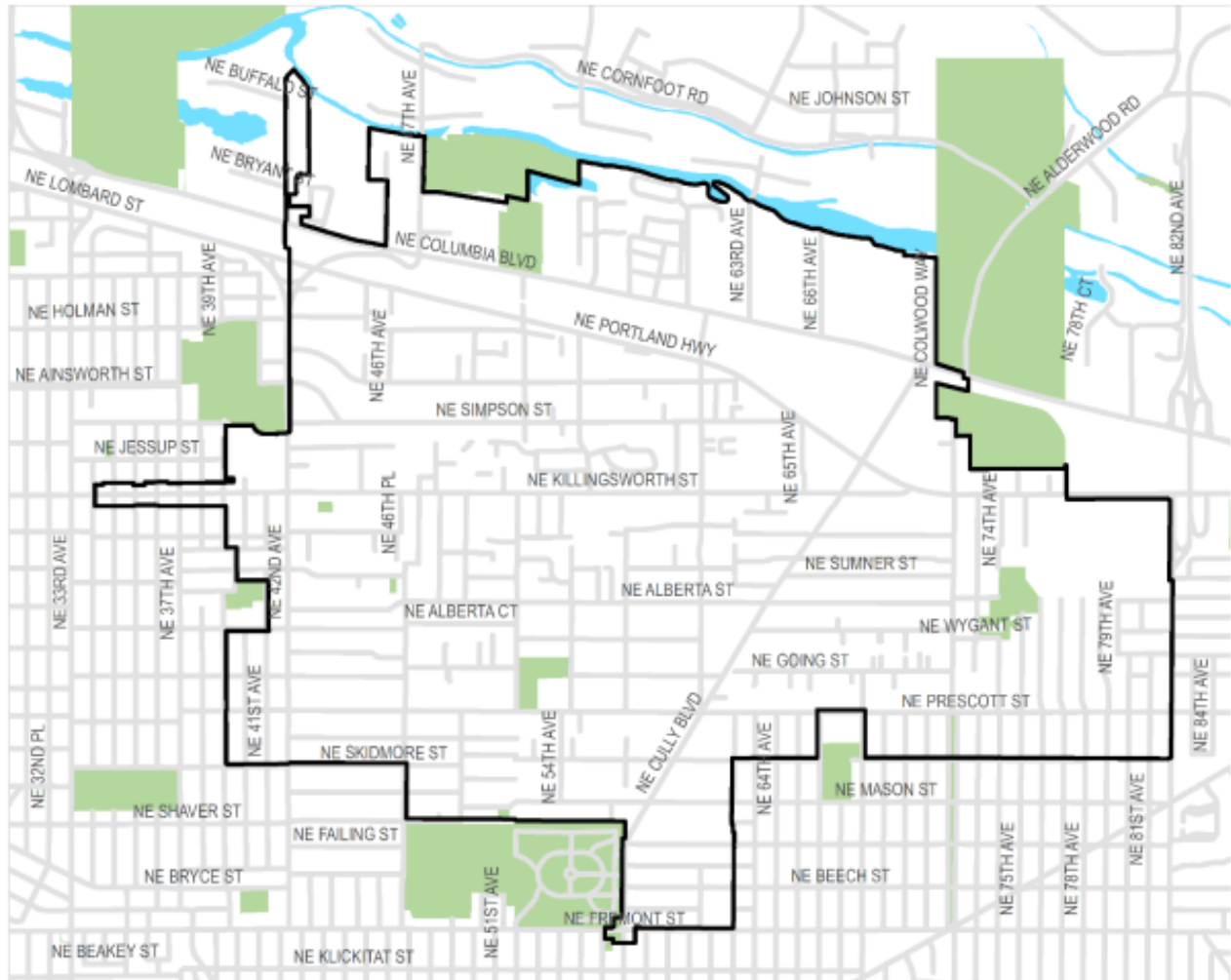
Tax increment resources available in the Cully TIF District are limited to physical construction. While this is a beneficial economic development tool, it is an incomplete tool. Non-restricted,

non-TIF funding sources are needed to assist with the wealth creation goals of this Action Plan. The following are recommendations regarding non-TIF funding sources.

1. Continue City support for existing Prosper Portland programs that will contribute to the success of this Action Plan:
 - **Support Business Technical Assistance:** Continue to provide culturally appropriate, easily accessible business technical assistance and mentorship to startups, small businesses and youth entrepreneurs.
 - **Provide Workforce Development Opportunities:** Continue to support workforce development for low-income youth and adults through the Economic Opportunity Initiative.
2. New activities that should be initiated and funded to increase the likelihood of success of this plan:
 - **Connect People to Jobs:** Partner with Portland Community College (PCC) to proactively connect unemployed and underemployed residents to jobs created by Prosper Portland's economic development activities, and to workforce development opportunities available through the public workforce system. Key activities include:
 - **Increase Job Training Support:** Support training for high demand, living wage occupations: health care, manufacturing, banking, construction.
 - **Develop Job Opportunities with Anchor Institutions:** Support the development of career-track, middle-wage jobs through a citywide anchor institution strategy focused on health care, public sector and/or educational institutions.
 - **Promote Culturally Relevant Financial Education Programs:** Work with partners to promote increased education for Priority Communities on wealth management, investing, and financial literacy.

Continue to build out this section

A. Cully TIF District Boundary Map



B. Glossary

This section to be revised when plan is finished – to include only terms used in the plan

“Action Plans” means a plan which proposes investments and programs in the TIF Area on a five-year basis.

“Affordable housing” means: TIF funded affordable housing is guided by the Tax Increment Financing for Affordable Housing Policy, and the supplementary Implementation Plan and Income Guidelines which are binding City Policy under Section 1.07.020 A of the City Code.

For rental housing: the Portland Housing Bureau (PHB) utilizes the HUD affordability standard, which states that the rent plus expenses associated with occupancy, such as tenant paid utilities or fees, does not exceed 30% of the gross household income, based on unit size, at the level of the rent restriction.

For homeownership units: the purchase price, for which the sum of debt service and housing expenses (including an allowance for utilities and other required ownership fees), when compared to the annual gross income for a family, adjusted for family size, does not preclude conventional mortgage financing.

“Affordable commercial space” means offering access and assistance to qualified businesses in the form of an equitable tenanting application processes, access to space, and in some cases additional financial support or incentives designed to lower the barriers to entry for emerging and small businesses, such as reduced rent, tenant improvement contributions and technical assistance.

“Annual report” is the ORS 457.460 requirement for the production of an annual report that gets distributed to the taxing districts.

“Area” or “TIF Area” means the properties and rights-of-way located within the Cully Tax Increment District Boundary. It is a defined geography from which tax increment financing is both calculated and spent. This term is understood to refer to and replace references to the term “urban renewal area” as defined in ORS 457.010(18).

“Area median income” means an income threshold set by Department of Housing and Urban Development, updated annually, generally in December. New thresholds are effective immediately. Current MFI thresholds can be found online at <https://www.portlandoregon.gov/phb/>

“Board of Commissioners” means the Prosper Portland Board of Commissioners.

“Charter” is the Governance Charter for the Cully TIF District, as the same may be amended from time to time, pursuant to its terms and conditions. It establishes the Community Leadership Committee.

“City” means the City of Portland Oregon and includes the Portland Housing Bureau.

“City Council” or “Council” means the Portland City Council.

“Cully Boulevard Alliance (CBA)” is an organization engaged in community economic development at the neighborhood scale within the Cully micro-TIF district; part of Prosper Portland’s Neighborhood Prosperity Network, this organization serves all of those who live, work, or support those in the outer NE Portland neighborhood of Cully.

“Culturally specific business” is a business that provides goods and/or services that are accessible to, and serve the specific needs of, individuals within a specific cultural community or communities. Culturally specific businesses often provide specific goods and services that are not available through many mainstream operations.

“Fiscal year” means the year commencing on July 1 and closing on June 30 of the next calendar year.

“Frozen base” means the total assessed value including all real, personal, manufactured, and utility values within a TIF Area at the time of adoption as more particularly described in ORS 457.430(1). The County Assessor certifies the assessed value after the adoption of a TIF area plan.

“Increment” means that part of the assessed value of a TIF area attributable to any increase in the assessed value of the property located in a TIF area, or portion thereof, over the Frozen Base.

“ITIN” means Individual Taxpayer Identification Number which is a tax processing number only available for certain nonresident and resident persons, their spouses, and dependent who cannot get a Social Security Number.

“Living Cully” means an innovative collaboration that formed in 2010 among Habitat for Humanity Portland Region, Hacienda Community Development Corporation, Native American Youth and Family Center, and Verde.

“Manufactured housing park” means an area or tract of land where two or more mobile homes or mobile home lots are rented or held out for rent.

“Maximum indebtedness” means the amount of the principal of indebtedness included in a plan pursuant to ORS 457.190 and does not include indebtedness incurred to refund or refinance existing indebtedness.

“Mobile home” of **“manufactured home”** means factory-built homes that can be placed on a piece of land.

“Neighborhood Prosperity Network Districts: (NPN/NPD)” is a program initiated by Prosper Portland to strengthen the economic competitiveness of neighborhood business districts through community-planned and community-implemented actions and projects. ELC means the Cully Exploration Leadership Committee.

“NOFA” means Notice of Funding Availability – means the official notice of availability of funds which may be disbursed for projects and is a means of soliciting proposals for undertaking projects.

“ORS” means the Oregon Revised Statutes. ORS Chapter 457 specifically relates to tax increment financing.

“Permanently affordable homeownership” means homeownership opportunities which prescribe affordability for subsequent buyers of the property or home, in contrast with homeownership opportunities which proscribe no additional affordability beyond the first purchaser.

“PHB” means the Portland Housing Bureau

“Prosper Portland” is the City of Portland’s economic and urban development agency.

“RFP” means request for proposals. It is a means of soliciting proposals for undertaking projects. It is a document issued by the City, Prosper Portland, a business or an organization to request bids for development, products, solutions and services.

“Regulated affordable unit” means a residential unit subject to a regulatory agreement that runs with the land and that requires affordability for an established income level for a defined period of time.

“Tax increment finance area plan” or “TIF plan” means a plan, as it exists or is changed or modified from time to time, for one or more TIF areas, as provided in ORS 457. This term is understood to refer to and replace references to the term “urban renewal plan” or “plan” as defined in ORS 457.010(19).

C. Criteria for TIF Funds

TIF investments will prioritize:

1. Business owners, property owners, and former residents, and their descendants, who owned businesses, owned property or lived within the Cully TIF District boundary and who have been displaced.
2. Existing businesses, property owners, and residents who:
 - a. Experience economic barriers to business, housing and property ownership in the Cully TIF District;
 - b. Are vulnerable to displacement from gentrification; or
 - c. Are providing services that are beneficial to Priority Communities.
3. Industrial area investments that create living-wage or high-wage jobs accessible to nearby residents, incorporate green elements or provide high-quality mitigation for potential impacts to surrounding areas.

Funding for housing will be allocated by the Portland Housing Bureau based on its program guidelines, following all fair housing, state and federal requirements.