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City of Portland and Cumberland County

Analysis of Impediments to Fair Housing Choice

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Executive Summary: Portland and Cumberland County Analysis of Impediments to Fair Housing Choice.

In fall 2021, the City of Portland and Cumberland County initiated a study of fair housing choice in the city and county called an Analysis of Impediments to Fair Housing Choice (AI). The fair housing study was completed to fulfill a requirement by the U.S. Department of Housing and Urban Development (HUD) to “affirmatively further fair housing” or AFFH.

The study was a collaborative effort between the City of Portland and Cumberland County and covered the 27 jurisdictions that represent the Consortia receiving federal HOME Partnership Investment Funds (HOME) from HUD. The HOME Consortia jurisdictions include: Baldwin, Bridgton, Brunswick, Cape Elizabeth, Casco, Chebeague Island, Cumberland, Falmouth, Freeport, Gorham, Gray, Harpswell, Harrison, Long Island, Naples, New Gloucester, North Yarmouth, Portland, Pownal, Scarborough, Sebago, South Portland, Standish, Raymond, Westbrook, Windham, and Yarmouth, within Cumberland County.

This study was informed by local knowledge and data, and robust community engagement through a resident survey, focus groups, and interviews with local leaders and stakeholders who work in the housing and planning industries or provide services to low and moderate income residents—advocates, community groups, service providers, educators, housing providers, and developers. Engagement occurred throughout the development of the study.

Altogether, more than 750 residents and stakeholders in the county took part in the development of the AI. The residents who participated in the survey were 52% owners, 40% renters, and 8% precariously housed. They were part of families with children (28%), single parent households (24%), older adults (24%), persons with disabilities (30%). They included income-diverse households and represented the racial and ethnic distribution of the county.

This Executive Summary:

- Provides background on the study;
- Presents the primary findings from the research that supported the AI;
- Identifies fair housing issues in the City of Portland and Cumberland County and participating jurisdictions; and
- Concludes with an action plan to address the issues residents face in accessing housing and economic opportunity.

Data and Methodology

The primary data sources and local knowledge and information that were used to develop the AI include:

- The Census' American Community Survey (ACS) from 2010 and 2020 (5-year data);
- Local housing development and permitting data from the City of Portland Housing and Community Development Department;
- Affordable housing development data from the National Preservation Database;
- Characteristics of residents of publicly supported housing from HUD's AFFH data and mapping tool;
- Home Mortgage Disclosure Act data from mortgage transactions;
- A resident survey developed and fielded for this study; and
- Interviews and focus groups with stakeholders who work in the housing and planning industries or provider services to low and moderate income residents.

Background

The Federal Fair Housing Act of 1968 requires HUD to administer its programs and activities in a manner which “affirmatively furthers” the policies of the Federal Fair Housing Act (FHA)—also known as affirmatively furthering fair housing or AFFH. This obligation extends to all federal agencies that administer housing and urban development programs, as well as subrecipients of those funds—including cities, counties, and states. As such, the City of Portland and Cumberland County, as recipients of housing and community development block grant funds, must demonstrate their commitment to AFFH.

One of the ways that communities can AFFH is to conduct an analysis of issues negatively affecting fair housing choice, and develop an action plan to meaningfully address the effects of the legacy of public and private policies and practices that intentionally or unintentionally created inequities. That process is often referred to as an Assessment of Fair Housing, or Analysis of Impediments to Fair Housing Choice (AI), or, in a new rule to update AFFH, an Equity Plan.

This study accomplishes the identification of fair housing issues led by a robust community process, and development of a meaningful action plan—all core aspects of the Equity Plan.

History of Housing Discrimination in the Region

Cumberland County's settlement history is closely linked with its economy and geographic location. Fishing, and the other types of agriculture that dominated the economy as the region was formed, as well as the area's distance from the center of the country's slave trade, discouraged the use of slavery. Yet Maine still played a role in the slave trade as early

as the 17th and 18th centuries, where both slave labor and profits derived from enslaved people helped develop many Maine businesses and communities. The slave economy in Maine was built mainly through the trading of lumber, molasses, and rum by merchants and shipbuilders.

The population of Black Mainers has historically been small compared to the white population. From 1830 to 1950, the Black population increased from 1,000 to 2,000 and the white population soared from 398,000 to 910,000. During this time, the state had a strong Nativist movement and presence of the Ku Klux Klan that ensure Black Mainers did not feel welcome despite their multi-generational residency.¹ Although segregation was never formally codified into law, other forces led to segregation—namely, housing discrimination.² Discrimination was also routinely experienced by Native Americans, Irish Catholics, French Canadians, and Jews.

According to Eben Simmons-Miller, a scholar in the politics of fair housing in Maine, housing discrimination “was the most recognized form of oppression faced by Maine’s African Americans” as late as the 1960s.³ While some middle class African American households found housing options in the broader region, African American households in Portland “...remained in ethnically mixed neighborhoods on the Portland peninsula as they could not afford the expensive rents elsewhere due to limited employment options.”⁴ Homes were often in substandard condition in these areas, thus impacting the value of the home and the amount of economic resources the neighborhood could attract. Discrimination within the housing market severely limited choices for racial and ethnic minorities and thus resulted in segregation within the city.

Ethnic minorities were also confronted with prejudice. Early census records in the Northeast recorded Acadians (French descendants living in Nova Scotia who had been forcibly removed by the British during the 1754-1763 French and Indian War), Irish, Jewish, and French-Canadian populations separately from the white population—indicating a different classification of residency. Although the 1820 Maine Constitution allowed Black men and people with no property to vote, it disenfranchised paupers who resided in houses made for poor people and those who received public assistance. Census data from 1850 to 1904 shows this population was mostly immigrants and people of color.⁵ In 1893,

¹ Lumpkins, Charles L.. "Civil-Rights Activism in Maine, 1945-1971." *Maine History* 36, 3 (1996): 70-85. <https://digitalcommons.library.umaine.edu/mainehistoryjournal/vol36/iss3/2>

² Lumpkins, Charles L.. "Civil-Rights Activism in Maine, 1945-1971." *Maine History* 36, 3 (1996): 70-85. <https://digitalcommons.library.umaine.edu/mainehistoryjournal/vol36/iss3/2>

³ Simmons-Miller, Eben. "Resistance In "Pioneer Territory": The Maine NAACP and the Pursuit of Fair Housing Legislation." *Maine History* 36, 3 (1996): 86-105. <https://digitalcommons.library.umaine.edu/mainehistoryjournal/vol36/iss3/3>

⁴ Hillebrand, Justus. "Making it Work Before the Movement: African-American Community and Resistance in 1940s and 1950s Portland, Maine." *Maine History* 49, 1 (2015): 39-76. <https://digitalcommons.library.umaine.edu/mainehistoryjournal/vol49/iss1/3>

⁵ Myall, James (2020). *Race and Public Policy in Maine: Past, Present, and Future*. *Maine Policy Review*, vol. 29, no. 2.

an amendment was added to the state constitution that required literacy tests to vote; this was a major barrier to poor white immigrants in the state. Mainers voted to enfranchise paupers in 1965 through a constitutional amendment and removed the literacy requirement in 1970 following an amendment to the Voting Rights Act.⁶ The history of voter enfranchisement is important to recognize, as the laws that elected officials dictated often reflected the attitudes of the white, economically powerful actors within the housing market.

A map of Portland made in 1935 used by bankers and real estate agents to evaluate mortgage risks designates “foreign-born, negro, or lower grade populations” as “hazardous.” It also labels where Irish, Italian, Jewish, and Polish neighborhoods were located.⁷ The practice of rating neighborhoods based on perceived risk was largely based on prejudice and excluded people in “hazardous” neighborhoods from accessing homeownership and the generational financial benefits that come with it. According to David Freidenreich, Professor of Jewish Studies at Colby College, real estate agents also steered Jewish and immigrant families away from affluent areas of town, thus creating segregated neighborhoods and unequal housing opportunities.⁸

Today, historical segregation in Portland and Cumberland County is reinforced by:

- Limited housing production and slow growth regulations;
- Lack of affordable housing, particularly for families outside of Portland, South Portland, Scarborough, and Westbrook;
- Denial of rental housing, especially for Housing Choice Voucher holders;
- Limited opportunities to attain homeownership;
- Disparities in educational attainment, which have long term effects on economic equality; and
- Land use regulations in some jurisdictions that favor more expensive, ownership housing and limit multifamily housing for all but seniors.

Primary Findings

This section summarizes the salient findings from the AI research, which was used to determine the primary issues, or challenges, to fair housing choice.

⁶ Ibid.

⁷ Maine Historical Society. Redline map of Portland and South Portland, 1935. <https://www.mainememory.net/artifact/105920>

⁸ Freidenreich, David. Redlining and Jewish Communities in Maine. <https://www.mainememory.net/sitebuilder/site/3086/page/4887>

Housing Choice

Housing production in Cumberland County lagged population growth between 2010 and 2020, leading to increases in prices and very low vacancies—conditions that negatively impact housing choice.

Population in Cumberland County rose by 7.6% between 2010 and 2020, while occupied and vacant housing units rose by 6%, according to the ACS data. Local permit data shows that Portland (District 5) produced the most housing units of any singular jurisdiction in the county between 2010 and 2022, with nearly 5,000 units approved and over 2,000 certificates of occupancy issued over that time period.⁹ A quarter of all units approved since 2010 are designated to be affordable. District 1 (made up of six jurisdictions) and District 2 (made up of eight jurisdictions) added an estimated 3,600 and 3,400 housing units between 2010 and 2020. The suburban communities of Scarborough and Westbrook each added a little more than 1,100 units over the same time period.

Mainers who are more likely to be disparately impacted by policies that limit development of housing, especially affordable housing, include:

- African American/Black households, Asian households, Hispanic households, Other Race household, and single parents (resident survey). These households report housing challenges—living in overcrowded conditions, living in housing in poor condition, being unable to maintain rent or utility payments—at higher rates than other resident groups.
- African/American/Black households also have the highest levels of segregation and experienced a large increase in segregation since 2010 (Figure IV-17).

Portland provides more housing to low income households than its proportionate share of county households overall. Specifically, the City of Portland houses 35% of households with incomes less than \$25,000, compared to 25% of all households in the county. Westbrook also houses a higher share of households with incomes below \$25,000 than households overall. In contrast, Falmouth, Gray, and Scarborough have the largest differences in the share of households with incomes of less than \$25,000 and households overall (Figure IV-23 series).

This difference is partially, although not entirely, related to the provision of affordable housing. A comparison of rental units priced at less than \$650/month (affordable to households with incomes of \$25,000 and less) showed modest differences in the share of affordable rentals compared to all rentals, with Bridgton, Brunswick, Portland, and mostly Westbrook providing a slightly higher share of affordable rentals than rental units overall. A

⁹ ACS data estimates for the city of Portland reported low unit growth between 2010-2020, which did not take into account recent permitting and approval activity.

similar analysis of owned homes found only modest variances in shares with only resort-oriented counties providing a lower share of affordable homes for purchase. In sum, the region is not significantly unbalanced, and differences are due both to where low wage jobs are located and where older residents living on fixed incomes are located, in addition to the location of affordable housing.

Deeply affordable housing—especially that accommodating families—is concentrated in Portland. The neighborhoods with the highest concentrations of affordable housing are also those with relatively high rates of poverty and schools with average educational proficiency. This is countered with strong access to employment. Outside of the Portland-South Portland area, most affordable units are targeted for elderly residents (Figure VI-46). **Policies that favor affordable elderly housing over affordable family housing work to limit access to quality education for low income families.**

In Greater Portland (Figure VI-26), Multiple Race and Other households face very high rates of burden while earning moderate incomes. This could suggest that discrimination in the housing market is limiting their housing choices, forcing them into disproportionately over-priced units.

Denial of rental housing is common, especially for voucher holders. Nearly 30% of respondents who looked for housing experienced denial of housing and **90% of voucher holders said finding a landlord that accepts vouchers is difficult to very difficult** (resident survey).

- Mainers most likely to be denied housing include: Other Race, Asian, Hispanic, and African American households, households making less than \$25,000, single parents, and households with a member experiencing a disability.
- Landlord refusal to accept vouchers disparately impacts African American/Black households who are disproportionately represented among voucher holders (Figure VI-42).

Nearly 20% of survey respondents have been displaced from their home in the past five years, mostly because they could not keep up with rent (resident survey).

- Single parents, precariously housed respondents, Other Race and African American/Black respondents, households that make less than \$50,000, and households with a member experiencing a disability reported the highest rates of displacement.

About 16% of survey respondents reported they have experienced discrimination in the past five years (resident survey).

- Hispanic, Other Race, and Asian respondents, as well as households making less than \$25,000, precariously housed respondents, and Brunswick respondents reported the highest rates of discrimination.

Of respondents reporting a disability, **about 25% report that their current housing situation does not meet their accessibility needs** (resident survey).

Homeownership

Homeownership opportunities for younger Mainers are increasingly limited by rapidly increasing housing prices. In Portland, Cumberland County, and the State of Maine, 85-year-olds are more likely to be homeowners than those under 35 years old.

African American/Black households have extremely low homeownership rates—11% in Portland and 19% in Cumberland County, compared to 25% in Maine (Figure VI-34). To close other racial gaps in ownership, an estimated 164 Asian renters, 51 Native American renters, and 141 Hispanic renters would need to become owners. A much larger number—1,169 African American/Black renters—would need to become owners to close the White/Black homeownership gap (Figure VI-32s).

Home loan denial rates were lowest among African American/Black and White Cumberland County applicants, at 10% and 11% respectively (Figure VI-38a). For African Americans, barriers to ownership are likely driven by several factors other than mortgage loan denials. Portland, which has the largest concentration of Cumberland County's African American/Black population, has a younger population and lower overall income relative to the county. Another factor is that the majority of Portland's African American/Black population are foreign-born. The foreign-born population faces distinct challenges to homeownership, including unfamiliarity with the banking system, language barriers, and credit history length. Moreover, for Portland residents who practice Islam, Islamic law does not allow taking on interest-bearing loans, which makes buying a home with a traditional mortgage infeasible. White applicants appear less likely to be denied in many of the neighborhoods where applicants of color are focusing their homebuying efforts—mostly in suburban Portland.

Access to Opportunity

On average, residents are fairly satisfied with their transportation situation. Stakeholders raised more barriers, noting that the lack of an effective regional public transportation system limits where residents can access jobs and pushes people to stay in Portland where costs are higher. Residents who report that they can't get to public transit or buses easily live in Scarborough and Windham, are Hispanic and Other, and households that make less than \$25,000 (resident survey).

Economically disadvantaged students make up more than half of school enrollment in the Westbrook School District, Harpswell Coastal Academy, RSU 17 (serving Harrison), and RSU 61 (serving Bridgton and Naples). These school districts also

experienced some of the lowest rates of student testing success among all county school districts (Figures V-15 and V-17)—suggesting that these districts need more support to address the needs of economically disadvantaged students.

Low educational attainment has long term effects on earnings and wealth building, and disparities in educational attainment can reinforce long term economic inequality. County residents with a bachelor’s degree earn 56% more than those with a high school diploma, while Portland residents with a bachelor’s degree earn 48% more than their counterparts with a high school diploma—higher than the state overall (Figure V-27). Educational attainment also affects the ability to attain homeownership: 52% of county residents with a high school diploma own their home, compared to 76% for those with a college degree (Figure V-29). **Compared to the state, it is more difficult for city and county households with lower levels of educational attainment to become homeowners.**

Zoning and Land Use

In recent years, common zoning ordinances and land use regulations are being reconsidered due to their historical effect of restricting housing production and choice. While laws in the State of Maine address many possible regulatory barriers to housing choice, local policies in some jurisdictions may impact housing choice and availability.¹⁰ These include:

- Growth ordinances that exempt affordable senior but not affordable family housing;
- Limited land available for multifamily development and/or use regulations which restrict housing density and unit types;
- Residential growth caps and other dimensional standards, such as large lot sizes;
- Limited public infrastructure, particularly water and sewer systems, and/or capital funding to build the public infrastructure systems needed to support a wider variety of housing and a range of densities; and
- Very large and restrictive dimensional standards that discourage or disallow all but higher-cost single family homes.

¹⁰ Refer to Section VIII of this report for more information and recommendations related to removing zoning and land use barriers to housing production.

Progress Addressing Fair Housing Issues Identified in Past AIs

The City of Portland last reviewed fair housing issues as part of the Greater Portland Council of Governments Sustainable Communities Initiative—*Sustain Southern Maine*—and in a 2013 AI. Both were adopted by the City Council.

The major housing issues in Portland that emerged from the 2013 AI included:

- Concentrations of poverty, African American/Black residents, foreign born residents, single parent households, and publicly assisted housing;
- Limits on the effectiveness of the Section 8 program due to lack of housing in the broader region;
- Housing choice issues for new immigrants caused by landlords' unfamiliarity of cultural customs and norms;
- Landlord skepticism around state funding of General Assistance and subsidy payments that are lower than market rents;
- Lack of awareness by landlords related to reasonable accommodations' laws and a belief that housing tenants with disabilities is costly;
- Bias against renting to single parent, female headed, households with children; and
- High and increasing rents.

Cumberland County conducted its AI in 2010. The issues identified in that study included:

- Fair housing violations occur in reasonable accommodations for persons with disabilities and discrimination based on familial status and sex;
- Refugee and immigrant housing needs are unaddressed;
- Discrimination based on source of income occurs; and
- There are limited options for affordable rental and ownership housing within entitlement and suburban communities. Zoning restrictions and limited water and sewer and utilities connections contribute to the lack of housing options.

The following fair housing issues were identified in the broader region in *Sustain Southern Maine*:

- Lack of knowledge about landlord/tenant and Fair Housing laws;
- Constraints on refugee choices of where to live;
- Shortage of barrier-free housing;
- Lack of awareness of reasonable accommodations;

- Setback requirements that prevent people with disabilities from getting ramps built;
- Need for homebuyer education and financial literacy for those under-represented in single family lending; and
- Vulnerability to lead hazards in housing for children.

To address these issues, the City of Portland:

- Actively pursued regional partnerships that work to widen the public transportation network and provide housing opportunities for a diversity of people throughout the region;
- Reformed land use regulations to increase allowable densities, reduce minimum lot sizes, incentivize affordable housing construction, and require affordable housing in certain contexts (more details on these efforts can be found in Section VIII);
- Works to encourage other communities in the region to develop affordable housing;
- Created a partnership with the Cumberland County Community Development Office and local landlord associations to provide landlord awareness workshops;
- Launched initial efforts to set up a housing liaison system to resolve landlord/tenant issues, resulting in the formation of the Rental Housing Advisory Committee; and
- Administers a Rent Control Board created by a citizen-approved initiative.

To address these issues, Cumberland County:

- Funded landlord education and training;
- Funded tenant education to increase awareness of fair housing laws and rights;
- Educated local policymakers and leaders on fair housing issues, including the Cumberland County Municipal Oversight Committee; and
- Worked with municipalities to encourage development of affordable housing in every community and ensure that local ordinances are consistent with state and federal law concerning group homes and special needs housing.

These efforts have been an important part of mitigating fair housing violations, raising awareness about affordable housing needs, and increasing fair housing knowledge and awareness.

As this AI update demonstrates, many of the county's and jurisdictions' housing challenges have increased since these studies were conducted, as a result of growing demand for housing, rising costs of housing, and intensifying economic inequality. These forces have made housing challenges worse due to a historical lack of investment in affordable housing to facilitate housing choice. In sum, **housing challenges have become more**

complex—requiring ambitious and collective efforts to expand housing choice.

Fair Housing Issues and Fair Housing Action Plan

This section outlines the fair housing issues identified in this AI with recommendations for how the participating jurisdictions should address the identified issues and further fair housing choice.

Primary Fair Housing Issues Negatively Affecting Housing Choice

Residents most affected by housing choice issues include African American/Black households, Asian households, Hispanic households, Other Race households, and single parents. Issues negatively affecting housing choice include:

- Limited housing, especially affordable housing production, contributing to rising rents and a loss of overall affordability;
- Lack of a local commitment of many jurisdictions to address regional housing needs;
- Concentrations of deeply subsidized rental housing in the city of Portland;
- Land use policies in many small jurisdictions that favor affordable elderly housing over affordable family housing, restricting access to high equality educational environments;
- Denial of rental housing to Housing Choice Voucher holders;
- Housing discrimination, especially for people of color, very low income households, and those who are precariously housed; and
- Zoning ordinances and land use regulations that restrict the type of housing needed, including affordable family housing and multifamily housing, from being developed.

Recommendations for addressing fair housing issues. To address production and affordability issues, Cumberland County should:

1. Activate the power of Maine’s new legislation (L.D. 2003) to increase the supply of housing:
 - a. Provide guidance and technical assistance to Cumberland County communities on how to rewrite land use codes to allow increased density for affordable housing developments. This should include developing model code language that jurisdictions can enact or model to ensure that duplexes/triplexes/ fourplexes (and similar types of low density, multi-unit housing) are feasible to develop. Stakeholders interviewed for this AI noted that some jurisdictions require unreasonably large lots for duplexes (e.g., four acres);

- b. Explore the feasibility of a program that incentivizes increased density, including up to six-plexes, in growth areas along corridors and in and near commercial zones when the majority of units are affordable¹¹;
 - c. Explore a partnership with the City of Portland to develop pre-approved development prototypes for ADUs to lower pre-development costs of homeowners; and
 - d. Explore a partnership with the City of Portland to work with community development financial institutions and foundations to develop favorable financing for affordable housing including ADUs.
2. Share the results of this study with local jurisdiction leaders and planning commissions and GPCOG membership and facilitate a discussion of how to establish a regional commitment to housing production, building upon the new statewide housing production goals. Explore with GPCOG tying transportation funding to progress toward production goals.
3. Share the results of this study with industry representatives, including property managers and real estate agents, through presentations at conferences and annual meetings, to build commitment to collectively addressing issues.
4. Encourage local jurisdictions to use the data and findings from this study to inform housing and land use planning.
5. Encourage housing authorities to improve their websites and language access options in housing applications, as discussed in Section VI.
6. Encourage local jurisdictions to remove bias against non-elderly affordable housing. Many zoning ordinances exempt senior housing from growth ordinances but not affordable housing. Restricting exemptions to senior housing has an adverse and disparate impact on families.
7. Fund education and training and testing to build knowledge of fair housing protections, especially to clarify that the state requires vouchers to be accepted under the “public assistance” protected class. This should include testing with real estate agents about prequalification requirements for certain protected classes (disparities were found in the resident survey) and testing to uncover appraisal discrimination, as well as training for property owners to build commitment to providing comfortable and culturally sensitive housing environments for New Mainers.
8. Evaluate the success of the public housing authorities’ “signing bonus,” repair grant, security deposit assistance, and damage reimbursement programs and seek funding to support the programs that have been shown to be successful in

¹¹ Austin’s Affordability Unlocked program would be a place to start.

increasing the number of landlords who offer units to Housing Choice Voucher holders.

To address production and affordability challenges: the City of Portland should:

1. Continue to invest in, require contributions of developers for, and incentivize development of affordable and mixed-income housing. Ensure that these efforts produce housing that is needed to address disproportionate housing needs by monitoring affordability, occupancy, and location of units developed.
2. Allow higher densities in multifamily development (six, eight- and greater) along corridors and priority growth areas, with proportionate dimensional (height, scale, etc.) bonuses for the inclusion of affordable units in new housing projects.¹²
3. Enact the recommendations to facilitate housing production of the Land Code Evaluation as part of Recode Portland Phase II. Make the recommended changes to the city's zoning code detailed in Section VIII, pages 18 through 19.
4. Fund education and training and testing to build knowledge of fair housing protections, especially to clarify that the state requires vouchers to be accepted under the "public assistance" protected class. Utilize the city's rental registration program to convey fair housing information.
5. Explore the use of City resources to assist low income tenants with deposit requirements for rental housing (first and last month's rent, security/damage deposits).
6. Explore the use of City resources to assist tenants with fair housing questions and requirements.
7. To support regional efforts of adding housing units at densities feasible in suburban and rural parts of Cumberland County, partner with Cumberland County to:
 - a. Explore developing a regional program that offers pre-approved development prototypes for ADUs to lower pre-development costs of homeowners;
 - b. Explore working with community development financial institutions and foundations to develop favorable financing for affordable housing including ADUs; and
 - c. Consider allowing larger sized ADUs and waiving fees for ADUs that are accessible or have universal design.

¹² Austin's Affordability Unlocked program would be a place to start.

Issues Affecting Homeownership Attainment

Residents most affected by issues affecting their ability to attain homeownership include young adults, African American/Black households, and Hispanic households. Issues impacting their ability to attain homeownership include:

- Limited stock of starter homes for first time and lower income buyers;
- Lack of funds for a downpayment and difficulty qualifying for mortgage loans; and
- Zoning ordinances and land use regulations restrict supply of more affordable starter home products.

Recommendations for addressing issues affecting homeownership attainment.

To address issues affecting homeownership attainment, Cumberland County and Portland should:

1. Explore programs funded by foundations that offer greater downpayment assistance to residents who historically faced discrimination and restricted access to homeownership.¹³
2. Study the financial feasibility of creating ownership products affordable to 120% AMI (and less), leveraging the land use changes afforded by L.D. 2003. Share this information with participating jurisdictions to demonstrate how new affordable ownership products can be created.
3. Complete the Action Plan items to address the fair housing issues detailed above.

Issues Affecting Access to High Opportunity Environments

Issues impacting access to high opportunity environments include:

- Difficulty accessing public transit or buses in suburban Portland jurisdictions and rural Cumberland County, pushing people into Portland where costs are higher and limiting where people with disabilities can live;
- Economically disadvantaged students are concentrated in a handful of school districts, which need more support to close learning gaps; and
- Low educational attainment exacerbates income inequality and limits wealth building through homeownership.

¹³ <https://www.cityofevanston.org/government/city-council/reparations> and <https://www.dearfieldfund.com/who-we-are/>

Recommendations for addressing issues affecting homeownership

attainment. To address issues affecting homeownership attainment, Cumberland County and Portland should:

1. Advocate for improvements to the county's public transportation system to more effectively connect low income workers with jobs both within Portland and in the broader region. Focus on accommodating the needs of persons with disabilities and pairing transportation investments with housing affordability opportunities.
2. Advocate for additional funding in schools that have disproportionate shares of economically disadvantaged students.
3. Accomplish the Action Items to expand housing choices for families in suburban and rural communities.