City of Milwaukie Draft Comprehensive Plan Housing Policies

April 29 CPAC Draft with CPAC comments annotated

General Comments

a. *Try to use affirmative or declarative language in all sections*
b. *Define the difference between attached (internal) and detached (external) ADUs*
c. *How's and definitions of terms like "vulnerable populations," "cultural differences," "proximity," etc*
d. *Performance guidelines, metrics*
   o *Need to define what they're supposed to be doing, make them measurable*
   o *Bake in a review procedure among all sections*
   o *All policies need to be scored against the 4 lenses, be intentional and specify priorities*
e. *Need to know how these different housing types are defined.*
f. *How can aesthetics cause gentrification?*
g. *Deed restrictions – if housing in Milwaukie has deed restrictions, can they block some of these housing efforts?*
h. *Where do age considerations fit in?*
i. *Say it as a regulatory statement if it's what we want.*
j. *We say we're going to do certain things in these policies. I find myself asking "how" a lot.*
k. *The policies need more specifics, what are the strategies attached to these types of policies?*
l. *We want to try and have the policies address all of the lens goals.*

EQUITY GOAL: *Provide housing options and reduce housing barriers for all people with special attention paid to people of color and those with low incomes.*

a. *What does "special attention paid" mean?*
   a. *Maybe change to "focus on" or "center"*
   b. *Do we also want to mention seniors?*
   c. *Too specific? Make it inclusive, "all ages and abilities"*

1. Provide a range of housing types allowed in all neighborhoods of the City by allowing a variety of rental (duplex and small apartment) and ownership (cottage cluster, tiny home, and rowhouse) options in low and medium density zones.
   a. *Change "all neighborhoods" to "residential neighborhoods*
   b. *"Provide a range of housing types" Get rid of "provide"*
      i. *Substitute with "allow"? Or say "provide opportunities for"*
   c. *Add "such as" before "duplex" and "cottage cluster"*
   d. *"all neighborhoods" doesn't seem like it reflects what we've heard from the survey so far*
      i. *Will need to reassess once online survey is completed*
      ii. *Be clear enough to provide guidance about the types of used that will be allowed in different areas*

2. Maintain a system of zoning that is less reliant on density distinctions and more reliant on regulating bulk, form, and coverage.
   a. *Not sure what it means, make it clearer, explain bulk and form*
   b. *Add design considerations too*

    c. ***General support regulating form, but how do we regulate compatibility (4-plex on a 5,000 sq ft lot is different than on a 15,000 sq ft lot)***

3. Zoning and code requirements should be written so that they do not create barriers that may limit vulnerable populations from finding housing in Milwaukie.
    a. ***"reduce barriers" versus "do not create barriers" – worried that may cause legal trouble in future***
    b. ***"vulnerable populations" – needs to be defined***
        i. ***Call out people of color***
    c. ***Zoning and code requirements "should", change to "will"***

4. Use city housing funding and other resources to help ensure that existing housing remains affordable and available to residents in all Milwaukie neighborhoods.
    a. ***"Use city housing funding" – don't think we want to tie housing to funding in this part of the plan, if do use, tie them to specific policies***
    b. ***"Use city housing funding and other resources" – not sure we can…it would be difficult to swing this with City Council without figuring out what funding tools look like***
    c. ***Talking about leveraging funds and retaining existing housing***
    d. ***Mention more about how there could be a variety of ways, versus just using funds***
    e. ***Talk about what we're trying to achieve***
    f. ***What are the tools we can use?***
    g. ***Take out "city housing funding and"***
    h. ***Would this fit better under affordability versus equity?***
    i. ***CET is only source of affordable housing funding and it cannot be used to ensure that existing housing remains affordable. It's only for producing housing.***
    j. ***How can you help keep existing housing affordable?***

5. Encourage development of homes that can accommodate people of all ages and abilities through use of accessible design features.

6. Consider cultural differences and values when developing code requirements related to housing development and design.
    a. ***"Cultural differences and values" – what does that mean? What are the differences? Larger homes for multi-generational housing, etc. ADUs for extended family members? Could we be more specific?***
    b. ***What does this look like in practice?***
    c. ***Is there a legal component/issue with this?***

7. Employ strategies that support the Fair Housing Act and affirmatively further fair housing.
    a. ***"Employ strategies" – what strategies?***

AFFORDABILITY GOAL: *Provide opportunities to develop housing that is affordable at a range of income levels.*

   a. ***Bring maps showing frequent transit lines***
   b. ***Can we mention rent control in this section?***
      a. ***State is doing this now, so cities don't have that freedom anymore to set this for themselves***
   c. ***Feel that all of the policy statements are vision statements versus policy and should be less general/more specific***
   d. ***Need to be cognizant about classist bias when considering different types of housing***
   e. ***Americans move too much to create a sense of community***
   f. ***Would like to make sure we have policies/programs around making sure we keep housing affordable, whether it's new construction or existing. Need to be aware of how policies can make housing easier to develop, but does not mean it is rented or sold at affordable levels for the community.***

1. Continue to implement strategies identified in the Milwaukie Housing Affordability Strategy and update the strategy to reflect market changes and conditions.

2. Allow for and encourage development of housing types that can be built and sold or rented at a lower cost, by permitting triplexes, fourplexes, and cottage cluster development in all residential zones.
   a. ***"lower cost" – define what this means. Lower cost for who?***

3. To lower development costs, allow a reduction in parking standards for new development in close proximity to transit.'
   a. ***"close proximity to transit" – don't think it's going to be enough. Need to consider frequency (as defined by the regional transportation plan) ← or not since the RTP is pre-recession so it may not be reflective of current "high frequency" times (20 min. versus 15 min.)***
   b. ***This needs to be more prescriptive***
   c. ***Encourage, "enhancing transit and make it more frequent"***
      i. ***How can we enhance transit so that this is more feasible?***
   d. ***Define what is "close proximity to transit" – ¼ mile? ½ mile?***
   e. ***"lower development costs to allow a reduction in parking standards..." – confusing, re-word to put the second part of the sentence first and vice-versa***

4. Provide opportunities for residential home owners to generate rental income or house family members by allowing for simple and straightforward processes to develop accessory dwelling units or convert units into duplexes.
   a. ***"provide opportunities for property owners to create income" – worried this goes against equity goals/policies, feel it would encourage more short-term rentals***
      i. ***Say for "long-term rental income" instead?***
   b. ***Change in process or reduced fees?***
   c. ***Fix the language – "allowing for simple and straightforward processes"***
   d. ***Add "(ADU)" after "accessory dwelling unit" for clarity***
   e. ***Not actionable, but this is a very important policy based on community feedback***
   f. ***Policies need to center the right communities***

       g.   Make language more active/declarative

5. Seek and maintain partnerships with non-profit housing developers and other affordable housing providers and agencies to create the opportunity to provide moderate-and low-income housing and rehabilitation activities within Milwaukie.
    a. *Do we have partnerships? (Alma responded but the response wasn't documented)*

6. Support the use of manufactured homes as an affordable housing choice.
    a. *Is there a way to talk about preserving mobile home parks?*
    b. *Is this really an affordable option? (can pay for the home, but then have to lease the land it's on)*
    c. *Add "preserve" before "manufactured homes"*
    d. *Bring in mobile home zoning like Portland? Just because there's only one mobile home park in the city limits doesn't mean we shouldn't try and protect it*

7. Support tiny homes (on wheels) as an affordable housing choice.
    a. *"Support tiny homes (including those on wheels)"*
    b. *Concerns about tiny homes and manufactured homes in clustered environments, like a manufactured home park, and creating an uninviting environment – would only support with a property maintenance code*
        i. *could there be a distinction that they are allowed on single properties versus concerns over clusters?*
    c. *Need to show the distinction that tiny homes could have wheels or not*
    d. *Does this include RVs?*
    e. *Need to be clear about what the root of the concerns are*
    f. *Cost of construction – tiny homes are not cheap*

8. Support code changes to how shelters and transitional housing options are defined.
    a. *reword*

SUSTAINABILITY GOAL: *Promote environmental, economic, and socially sustainable practices associated with housing development and construction.*
    a. *Missing: live/work type housing, reuse of existing properties (adaptive reuse), incentivizing solar, charging stations for electric vehicles with new housing*
    b. *We need to be intentional about we mean by "economic sustainability" since it can be used nefariously. Suggestion to focus this section primarily on environmental sustainability.*
    c. *Should we just emphasize the environment since we address livability and equity elsewhere?*
        a. *No, social sustainability is important*
        b. *David pointed out that social sustainability is largely covered under equity and affordability.*
    d. *Need to make sure they are addressing equity and affordability goals and balanced together*
    e. *Economics = economics of affordability – make sure it's defined this way*
    f. *Include stronger language about preserving natural areas. Keep housing away*
        a. *How do we protect these areas when we also want equity and affordability?*

1. Encourage development of new housing to be sited to preserve open spaces, trees, and natural areas and when trees must be removed require trees to be planted to help achieve City-wide tree canopy targets.
    a. *";" after "natural areas"*
    b. *Where are trees to be planted? Same site? Different site? Both?*
        i. *Keep community informed on types of trees that will be planted in the public "ROW". This is supposed to be happening, but there are instances where it hasn't*
            1. *Tay: should we be concerned about the equity component of this? Some people are allergic to pollen from various trees*
    c. *Add or reference tree canopy goal*
    d. *Would like stronger language to be more committal. In its current form, it doesn't seem to align with equity or affordability goals*
    e. *Make sure wetlands are protected, include flood plains*

2. Provide and market existing incentives for new housing or improvements to existing housing to include features that increase energy efficiency, reduce water usage, use sustainably produced materials, manage stormwater, or other environmentally sustainable practices.
    a. **Re-word, confusing (especially preamble)**
    b. **Include renewable energy production**
    c. **Too many of the word "existing"**
    d. **"marketing" – getting muddled but is important**
    e. **Mention EV charging stations**

3. Encourage development of more housing located close to transit, shopping, other commercial services, parks, and schools to maximize access and use, reduce impacts of driving, and promote economic opportunities for local businesses.
    a. *Encourage local business owners to help create a sense of community*
    b. *"resident owned" local business owners? Milwaukie-owned?*
    c. *Make it clear if this is to reduce driving for residents of Milwaukie AND business owners*
    d. *Add "that employ Milwaukians" after "promote economic opportunities for local businesses"*
    e. *Encourage adaptive reuse of existing buildings for new businesses or other uses*
    f. *Re-word, confusing, need to make it clearer about encouraging more walking versus driving*
        i. *Should we work on language to make it less ableist? Not everyone can walk or use non-motorized vehicles (e.g. electric wheelchairs)*

LIVABILITY GOAL: *Enhance the ability of Milwaukie's neighborhoods to meet community members' economic, social, and cultural needs, and promote their health and well-being.*
    a. *Encourage universal design of accessibility*

1. Develop and implement land use and public investment decisions and standards that foster creation of denser development in centers, corridors, and neighborhood hubs to support community gathering places, commercial uses, and other amenities that give people opportunities to socialize, shop, and recreate together.

2. Require that new housing development includes and provides access to pedestrian connections that make it easier for people to walk to destinations such as parks, schools, and neighborhood gathering places.
   a. ***Include wording about bicycles, pedestrians, non-motorized vehicles – "active transportation"***
      i. ***See ableist comment above***

3. Establish and administer development code standards that require or encourage the design and/or siting of new housing development to have access to light, air, and open space either on-site or in close proximity.
   a. ***Include community gardens with light and air. Add it after "open space"***
   b. ***What does "in close proximity" mean?***

4. Regulate the size, shape, and/or position of new housing to ensure that it is similar in form to the housing in the surrounding neighborhood, while meeting the intent of equity and affordability related housing policies.

5. Implement development or design requirements to help create transitions between lower and higher density residential development where the mass, size or scale of the developments differ substantially. Requirements could include massing, buffering, screening, height, or setback provisions.

6. As necessary, monitor and regulate the location and amount of vacation rentals to reduce their impact on availability and long-term affordability of housing.
   a. ***Get rid of "as necessary"***

OTHER POLICIES

1. Continue to maintain a supply of land that can be developed for housing. Prepare, regularly monitor and periodically update an inventory of buildable residential land.

2. Prevent displacement of tenants of rental housing through tenant protection policies such as required notice for no-cause evictions, tenant relocation considerations, and/or educational programs or other initiatives.

3. Support a continuum of programs led by community partners that address the needs of homeless persons and families, including through the provision of temporary shelter, long-term housing, and supportive services.

4. High Density Residential areas shall be located either adjacent to or within close proximity to the downtown or district shopping centers, employment concentrations and/or major transit centers or transfer areas. (*Existing Comp Plan policy that is still probably relevant*.)

5. Make quick local policy updates to reflect state housing legislation that impacts land-use???