Lens Matrix Comments (Joseph Edge): City of Milwaukie Draft Comprehensive Plan Housing Policies Incorporates comments from April 29 CPAC Meeting

## How to Read this Document

There is one table per Goal (Equity, Affordability, Sustainability, Livability). Each row in the table (below the heading) numbers and identifies a draft Policy. Columns are present for each of the four lenses; in each row within each lens column is a commentary about how that policy addresses or conflicts with that lens.

Many policies have overlapping attributes and benefits or impacts for one or more of the lenses. In these cases, you may see the text similar to "See #1S above." These references refer to other comments in the same table (the number is the row number, the letter is the lens column - E, A, S, L), unless formatted like "See Sustainability #2E above," in which case you look in the "Sustainability Goal" table, to row 2 and column E (Equity). These references should apply in their entirety to the current policy and do not expect the reader to substitute terms or concepts to apply to the current policy.

There are no citations to external resources or references. It is expected that all of the policy assertions can easily be validated by contemporary planning literature or published research. In the event that any assertions can not be easily verified, please contact me and I will share sources.

## **Key Definitions**

Active measures: programs or activities that offer incentives, disincentives, or regulations to land use or development occurrences to support affirmative progress towards achieving policy objectives. May include a monitoring and tracking component. May include any form of incentive or disincentive.

Vulnerable populations: people of color, cognitive or mobility challenged and aging populations, and people with low incomes.

## Notes

Certain policies will yield results that are contrary to the objectives of other policies. Guidance may be appropriate for resolving these conflicts in some cases rather than deferring to future City Councils, Planning Commissions, or Planning Directors to interpret intent or priority.

Guidance for conflicting policies may be in the form of an expressly-stated preference for one goal, objective, or policy over certain others (e.g., *more housing* is always preferred over *neighborhood character*); instructions to leverage the best available data to more flexibly support a policy objective (e.g., *protecting salmon habitat* vs. *public access to nature and waterways* can be weighted by using the best-available science to guarantee salmon habitat protections even if some public access to habitat is permitted); a balancing test of several objectives (e.g., in sum, how many objectives are satisfied by intensifying a residential land use by redevelopment vs. adaptive reuse); or a specific preference based on some condition (e.g., policies requiring off-street parking may be waived completely during a *declared housing emergency*).

By using a toolkit of various approaches to conflict resolution, future leaders and decision authorities can be directed towards the preferred approach while allowing for new information or developments that may lead to different priorities than we have today. However, some policies or objectives may be so critical as to warrant explicit prioritization instructions that should apply in all cases.

|   |   | Comments re: four lenses  |   |  |   |
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|   | EQUITY GOAL: Provide housing options and reduce housing barriers for people of all ages and abilities, with a special focus on people of color, aging populations, and those with low incomes.  | Equity  | Sustainability  | Livability   | Affordability   |
| 1 | Provide the opportunity for a range of middle housing types in residential neighborhoods of the City by allowing a variety of rental (accessory dwelling, duplex and small apartment) and ownership (cottage cluster, tiny home, and rowhouse) options in low and medium density zones. | Improves equitable access to benefits of living in residential neighborhoods by legalizing housing types that are less expensive to produce and require less land area per dwelling than contemporary single family houses. More units per acre reduces the land cost per dwelling and simply provides a greater quantity to respond to an increasing population, reducing competition for dwellings and thusly reducing prices. People of color and historically disadvantaged communities are shown to have lower incomes than those who live and own contemporary single family houses in low density residential neighborhoods. A more equitable Milwaukie would take measures to "lift up" disadvantaged populations to ensure they have the same opportunities and access to low and medium density residential neighborhoods as the households who already live and own there. | Improves sustainability by reducing land required per dwelling unit, reducing the need to expand the regional urban growth boundary to accommodate an increasing population. Increasing the overall percentage of housing that is attached housing will conserve energy compared to the maintaining the current percentage that is detached housing. Attached housing typologies offer greater flexibility in site design that can better protect habitat and open space. | Greater diversity of residents and more neighbors to participate in community life, provide security via "eyes on the street" and sustain local business. Attached housing typologies offer greater flexibility in site design that can better protect habitat and open space. | Legalizes housing types that are less expensive to produce and require less land area per dwelling than contemporary single family houses. More units per acre reduces the land cost per dwelling and simply provides a greater quantity to respond to an increasing population, reducing competition for dwellings and thusly reducing prices. |
| 2 | Establish development standards that are less reliant on density distinctions and more reliant on regulating size, shape, form, and design details compared to what has been historically permitted in city neighborhoods.  | Current practice of restricting the quantity of dwellings per acre is known as "exclusionary zoning" and has been used historically to leverage market pricing pressures (via manipulation of supply and demand principles) to limit access to city neighborhoods by people of color and lower income households. A more equitable Milwaukie would seek to remedy this historic and racist practice by taking active measures to improve access to city neighborhoods for households of color and historically disenfranchised communities.   | See #1S above.  | See #1L above. Also addresses aesthetic concerns about neighborhoods, which is often declared as a livability concern.   | See #1A above.  |
| 3 | Ensure zoning and code requirements do not create barriers to home ownership and rental opportunities for vulnerable populations such as  | See #2E above. Also expressly declares intent of zoning/code to provide opportunities for all   | See #1S above.  | See #1L above.   | See #1A above. Also expressly declares intent of zoning/code to provide opportunities for people with low incomes.  |

|   | people of color, aging populations and people with low incomes.  | residents with a specific focus on vulnerable populations, getting to the very heart of equity.   |  |   |  |
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| 4 | Leverage resources and programs to help ensure that housing (including existing housing) remains affordable and available to residents in all residential neighborhoods of Milwaukie.                                | See #3E above. Exercise caution about providing a public subsidy to land- or dwelling-owners to maintain a use that benefits a very small number of residents in cases where a larger number of residents would benefit and other policies would be better satisfied. | See #1S above.   | See #1L above. Also helps preserve the existing fabric of neighborhoods by limiting displacement of vulnerable residents.         | See #3A above. Missing instructions to leverage "best available data" to track affordability and displacement measures and establish thresholds for action to guarantee affirmative progress towards this policy throughout the planning horizon.  |
| 5 | Encourage development of homes that can accommodate people of all ages and abilities through use of universal design.  | Expressly supports equitable access to housing for residents of different abilities.  | In residential neighborhoods this would be implemented as dwellings that can be accessed without stairs. Detached single family dwellings addressing this policy would require more land area per dwelling, requiring some mitigation to be consistent with the Sustainability lens. | See #1L above. See #5S left. To mitigate for Livability lens would need to address reduced walkability, fewer eyes on the street. | Universal design has affordability implications by increasing construction costs. In detached single-family typologies, costs are further increased due to more land per dwelling or mechanical systems such as elevators. Active measures may be required to guarantee affordability, including multifamily construction, planned developments, cottage clusters, up-and-down duplexes, reduced minimum lot sizes, etc. |
| 6 | Consider cultural differences and values when implementing development and design standards, including the need to accommodate extended family members and provide opportunities for multi-generational housing.     | Gets to the heart of equitable development. Offers appropriate and essential flexibility for implementation.  | Consider a policy to instruct or provide guidance towards mitigating design that conflicts with sustainability objectives.   | Consider a policy to instruct or provide guidance towards mitigating design that conflicts with livability objectives.            | Consider a policy to instruct or provide guidance towards mitigating design that conflicts with affordability objectives.  |
| 7 | Support the Fair Housing Act and programs and policies that aim to affirmatively further fair housing.   | Gets to the heart of equitable development.   | See #6S above.   | See #6L above.  | Directly supports Affordability.   |
| 8 | 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. | Policy should support guidelines or standards for guaranteeing equitable distribution of program resources.   | See #6S above.   | See #6L above.  | Directly supports Affordability.   |

| 9 | 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. | Gets to the heart of equitable housing objectives. People deserve reasonable protections from the consequences of inadequate (event if well-intended) housing policy, such as a failure of the market to deliver enough housing units to meet demand. | See #6S above. |  | Missing instructions to leverage "best available data" to track affordability and displacement measures and establish thresholds for action to guarantee affirmative progress towards this policy throughout the planning horizon. |
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|   | AFFORDABILITY GOAL: Provide opportunities to develop housing that is affordable at a range of income levels.   | Affordability   | Sustainability   | Livability   | Equity  |  |
| 1 | Continue to develop and update housing affordability strategies that meet the needs of individuals and reflect market changes and conditions.  | Missing instructions to leverage "best available data" to track affordability and displacement measures and establish thresholds for action to guarantee affirmative progress towards this policy throughout the planning horizon.  | Consider a policy to instruct or provide guidance towards mitigating design that conflicts with sustainability objectives.   | Consider a policy to instruct or provide guidance towards mitigating design that conflicts with livability objectives.   | Policy should support guidelines or standards to optimize equitable distribution of affordable housing delivered by strategies.   |  |
|   |  | It is appropriate that the Comp Plan allow for flexibility in the specific responses or strategies employed by the City to maintain or improve supply of housing affordable to all income levels. Guidance may be appropriate for which approaches may be preferred so that the City could consider an incremental phasing-in of successive approaches based on the level of success measured towards affordability objectives. E.g., if a Centers-based approach is ineffective at reducing rent increases or displacement after two years, a Corridors-based approach kicks in. If after two years, rents and displacement are still not controlled effectively, a Dispersed strategy kicks in. |  |  |   |  |
| 2 | Allow and encourage development of additional middle housing types with lower construction costs and sales prices that can help meet the needs of low or moderate- income households. Examples include accessory dwelling units (ADUs), duplexes, triplexes, fourplexes, cottage cluster housing, and small apartment complexes. | Directly supports affordability. Key to making housing accessible for lower-income households.  | Directly supportive of Sustainability lens by using land more efficiently than present typologies. Policies could guide these typologies to locate close to transit, regional trails, or centers, and would seek to require less motor vehicle parking to incur less driving, which has positive impacts on all aspects of | Greater diversity of residents and more neighbors to participate in community life, provide security via "eyes on the street" and sustain local business. Attached housing typologies offer greater flexibility in site design that can better protect habitat and open space. | Improves equitable access to benefits of living in residential neighborhoods by legalizing housing types that are less expensive to produce and require less land area per dwelling than contemporary single family houses. More units per acre reduces the land cost per |  |

|   |  |  | sustainability. See also #3S.  |  | dwelling and simply provides a greater quantity to respond to an increasing population, reducing competition for dwellings and thusly reducing prices. People of color and historically disadvantaged communities are shown to have lower incomes than those who live and own contemporary single family houses in low density residential neighborhoods. A more equitable Milwaukie would take measures to "lift up" disadvantaged populations to ensure they have the same opportunities and access to low and medium density residential neighborhoods as the households who already live and own there.   |
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| 3 | Allow for a reduction in required off-street parking for new development within walking distance of light rail stations and frequent bus service corridors in an effort to lower development costs and better meet the housing needs of low and moderate-income residents. | Direct implications for Affordability. This is the lowest-hanging fruit towards improving affordability. Parking spaces cost \$25,000 each to construct (closer to \$100,000 per space in basement/structured parking garages), costs that are ultimately incurred by residents, whether or not they own cars. | Supports all aspects of Sustainability including economic (lower household costs of vehicle ownership and maintenance, lower public costs for infrastructure and pollution mitigation, as well as reducing the public and private costs resulting from deaths, injuries and health impacts that only occur due use of motor vehicles), social (less driving will result in fewer deaths and injuries and increased level of street-level direct social interaction), and environmental sustainability (reduced air pollution from exhaust and reduced groundwater pollution from brake dust, motor oil, etc.). | Accommodating fewer privately owned vehicles permits roadway cross sections that are more human-scaled, and are thus more livable, comfortable, navigable, and inviting. Fewer vehicles means less traffic and less danger to vulnerable road users.  Due to current point in history, a presently high but falling proportion of urban dwellers own private motor vehicles. Policies should explicitly prescribe that all parking facilities - private, public, and in the public right-of-way - are to be designed and constructed with future reuse/redevelopment capability demonstrated in permit applications. | The sum of #3A, S, and L describe a very Equitable scenario whereby lower-income and historically disadvantaged households incur less of the costs - social, economic, environmental, public and private - associated with private vehicle ownership and operation. Today - and likely throughout the ~20 year planning horizon of this process - the costs of private vehicle ownership will continue to be disproportionately borne by households that do not own a motor vehicle. Lower-income households own fewer motor vehicles than wealthier households and the share of lower-income households that own no vehicles at all is much greater than it is for higher income households. To achieve equity, policies should seek to "lift up" historically disadvantaged populations to a level playing field - e.g., their contributions to the transportation system are |

| 4 | Provide opportunities for home owners to generate long-term rental income or house family members by through a simple, straightforward, and cost-effective permitting process for the development of accessory dwelling units (ADUs) or conversion of single- family homes into duplexes or other "middle housing" types. | While clearly protecting the ability of homeowners to continue to afford to remain in their homes, if ADUs and single-family to duplex conversions are intended to fulfill a long-term housing supply need then policies are needed to require monitoring and regulation to guarantee that these dwelling units are not undermining affordability and equity objectives | While leveraging the embodied energy and carbon of an existing structure and perhaps delaying its demolition, this policy could result in anemic intensification of uses on oversized lots, delaying potential redevelopment that could benefit a much larger group of people. Policies should clearly favor redevelopment  | Supports Livability by adding "gentle density" that supports more services and vibrant community life without causing a transformative effect on the neighborhood. | proportionate to the impacts caused by their use and the benefit they receive relative to higher-income households, and be progressive based on household income.  Given that much of this formula is outside the scope of the City's authority to regulate, every available measure to disaggregate the cost of motor vehicle accommodations should be leveraged to most equitably levy those costs directly upon those who demand or benefit from those accommodations, with measures to mitigate for the impacts of those accommodations upon vulnerable populations. This policy is essential as written but barely scratches the surface of what will be necessary to equitably distribute the costs of the transportation system.  Exercise caution about providing a public subsidy to land- or dwelling-owners to maintain a use that benefits a very small number of residents in cases where a larger number of residents would benefit and other policies would be better satisfied. |
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|   |   | and policies.   | and infill for (larger) sites with that potential.  |  |   |
| 5 | Continue to seek and maintain partnerships with non-profit housing developers and other affordable housing providers and agencies to create the opportunity to provide low to moderate income -housing and rehabilitation activities within Milwaukie.  | Support affordable housing providers by streamlining permitting and approvals, increasing certainty by developing standards for cost-saving incentives (like reducing parking), and issuing guidelines for equitable distribution of and access to resources.   | To address the Sustainability lens, the City's role is to consider the overall sustainability of an Affordable Housing development for its total lifecycle. Affordable Housing has a surplus of value for the Social element, but might need guidance from City policies to implement measures that address total-lifecycle affordability (energy use, quality of | Greater diversity of residents and more neighbors to participate in community life, provide security via "eyes on the street" and sustain local business.          | See #1E above.  |

|   |  |   | materials, etc.). Programs could allow for phased implementation of sustainability measures (like energy generation and capture, water capture and reuse) or City subsidies or grants to implement design features that will better guarantee economic and environmental sustainability over the total lifecycle of the development. |  |  |
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| 6 | Support the continued use and preservation of manufactured homes, both on individual lots and within manufactured home parks as an affordable housing choice.  | Expressly supporting this housing typology formalizes support of a very affordable housing option.        | Total lifecycle sustainability should be considered for this housing typology. Energy and transportation costs should be considered and mitigated, perhaps by a program that permits construction of small dwellings in parks to replace manufactured homes that have surpassed their lifespan.                                      | While considering costs, ensure frontage improvements at parks are supportive of neighborhood livability, or appropriate mitigation. | The City should seek to guarantee equitable access to manufactured home parks.   |
| 7 | Support the use of tiny homes, including those on wheels, as an affordable housing choice, while addressing adequate maintenance of these and other housing types through the City's code enforcement program. | See #6A above.  | Few sustainability impacts, but presents an opportunity to guarantee that upon conclusion of the use, the previously disturbed land can be returned to natural use.  | Adds housing and residents where there currently are none, increasing safety via "eyes on the street".                               | Historically, enforcement activities are disproportionately leveraged against people of color. Very deliberate care must be taken to ensure that enforcement activities do not place a disproportionate burden on people of color. |
| 8 | Clearly define and implement development code provisions to permit homeless shelters and transitional housing in Milwaukie.  | Helps to mitigate the impacts of an inadequate supply of housing that is affordable to all income levels. | Consider a policy to instruct or provide guidance towards mitigating design that conflicts with sustainability objectives.   | Consider a policy to instruct or provide guidance towards mitigating design that conflicts with livability objectives.               | The City should issue guidelines or standards to ensure equitable access and distribution of homeless shelters and transitional housing.   |
| 9 | Monitor and regulate the location and quantity of vacation rentals to reduce their impact on availability and long-term affordability of housing.  | This is essential and directly benefits affordability at all income levels.                               | Consider a policy to instruct or provide guidance towards mitigating design that conflicts with sustainability objectives.   | Consider a policy to instruct or provide guidance towards mitigating design that conflicts with livability objectives.               | See #7E above.   |

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|   | SUSTAINABILITY GOAL: Promote environmental and socially sustainable practices associated with housing development and construction.   | Sustainability  | Affordability  | Livability  | Equity   |  |
| 1 | Ensure that the scale and location of new housing is consistent with city goals to preserve open spaces, achieve a 40% citywide tree canopy; and protect wetland, floodplains, and other natural resource or hazard areas.  | This is an excellent policy that provides a great deal of flexibility in achieving the desired sustainability outcomes across environmental, social, and economic elements.   | Housing opportunities that would be lost due to hazards, habitat, or open space designations should be allowed to be transferred on-site or to off-site "opportunity zones" where housing is encouraged to avoid reducing supply and negatively impacting affordability. | This policy strongly supports the Livability lens by increasing tree canopy, open space, and access to nature.  | Active measures may be needed to ensure equitable distribution of tree canopy to include lower-income neighborhoods. Construction of housing typologies that target lower-income households should not be located in areas not well-served by transit or the active transportation network, nor in areas outside of regulatory hazard areas but inside of practical hazard areas (outside the "100-year floodplain").  |  |
| 2 | Use incentives to encourage, and where appropriate require, new housing development, redevelopment, or rehabilitation projects to include features that increase energy efficiency, produce energy or use renewable energy, conserve water, use sustainably produced materials, manage stormwater naturally, or employ other environmentally sustainable practices. | It may be appropriate to offer guidance about thresholds that trigger a requirement for various features.   | City programs should be maintained that provide grants, rebates, or other incentives for low-income housing developments to include features that also reduce the ongoing operational costs for residents.   | Energy production and other sustainability features should not be located adjacent to pedestrian spaces or public rights-of-way unless designed to enhance the pedestrian experience (interactive/educational features, rain gardens/stormwater planters, etc.).  | Active measures may be needed to ensure equitable access to housing where desirable but costly sustainability features are included in the development.  |  |
| 3 | Promote the use of active transportation modes, reduce driving by neighborhood residents and workers, and increase economic opportunities for locally owned and operate businesses by encouraging development of more housing located close to transit, shopping, other commercial services, parks, and schools.  | Reducing dependence and utilization of motor vehicles has myriad benefits across all sustainability elements. Environmental: Reduces air pollution from exhaust and toxic water pollution from brake dust metals, motor oils and fluids, and can lead to improved groundwater infiltration if significant pavement removal is achieved. Economic: Reduces public cost of construction and maintenance of transportation infrastructure when a larger share of trips are served by | Active measures may be needed to ensure affordability across multiple income levels for housing located near desirable amenities that facilitate living without a motor vehicle.   | Directly supports livability by reducing motor vehicle traffic over the long term and improving safety and walkability through the addition of active transportation infrastructure as development takes place. Americans who live in communities with a richer array of neighborhood amenities are twice as likely to talk daily with neighbors than those in neighborhoods with fewer amenities. In low-amenity suburbs, 55% of residents report a high degree of social isolation, vs. ~30% in high-amenity suburbs. | Active measures may be needed to ensure equitable access to housing where desirable active transportation infrastructure is located. 23% of Americans live in high-amenity communities, 44% in moderate-amenity communities, and 33% in low-amenity communities. Due to limited supply of high-amenity neighborhoods, residents are disproportionately whiter, wealthier, and better educated. Guidance may be appropriate for preference to improve equitable distribution of new housing in high-amenity |  |

|   |  | space-efficient modes such as walking, bicycling, or even transit use. Reduces private household costs resulting from maintenance and operation, storage, insurance, medical costs resulting from injuries sustained from motor vehicle collisions. Reduces costs of building and maintaining parking facilities and the opportunities lost from devoting so much land area to motor vehicle storage. Higher concentrations of residents are more easily able to sustain a diverse array of small business in the community. Social: Reduces social impacts from injuries, deaths and health impacts of motor vehicle use. If streets can be redesigned, improves livability of streetscapes to be community spaces rather than motor vehicle |   | Residents living in high-amenity urban neighborhoods are twice as likely to trust their neighbors and coworkers, and to trust and have confidence in their local government. | neighborhoods vs. improving equitable distribution of new amenities into existing low-amenity neighborhoods. People of color and lower-income households are more likely to bike or walk for transportation and make up a disproportionate share of roadway fatalities. The single largest group of Americans who bike to work earn under \$10,000 per year.  A more equitable Milwaukie would design infrastructure and reallocate public right-of-way to guarantee the same level of comfort, safety, and convenience to vulnerable and historically disadvantaged populations as that enjoyed by wealthier households. |
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|   |  | streetscapes to be community spaces rather than motor vehicle thoroughfares.  |   |  | populations as that enjoyed by wealthier households.  |
| 4 | Encourage the adaptive reuse of existing buildings in residential and mixed-use areas that can help meet Milwaukie's housing needs.  | Leverages the embodied energy in already existing structures, at a lower cost than new construction.  | Generally supports affordability by requiring less capital to develop per unit than new construction. | Contributes to vibrant streetscape by maintaining a diverse array of building types and styles.  | Active measures may be needed to ensure equitable access to housing in adaptively reused buildings.   |
| 5 | Prepare, regularly monitor and periodically update an inventory of the buildable supply of residential land that can help meet the City's future housing needs in an efficient and sustainable manner. | Hints at sustainability but ambiguous. Buildable supply should consider sustainability metrics.   | Add "and key affordability metrics" after "residential land"  | Buildable supply should consider livability metrics and weight development potential by density of amenities within walking distance.  | Consider adding "equitable" after<br>"efficient"  |

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|   | LIVABILITY GOAL: Enhance the ability of Milwaukie's neighborhoods to meet community members' economic, social, and cultural needs, and promote their health, well-being, and universal access.   | Livability   | Affordability  | Sustainability  | Equity   |
| 1 | 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. | Americans who live in communities with a richer array of neighborhood amenities are twice as likely to talk daily with neighbors than those in neighborhoods with fewer amenities. In low-amenity suburbs, 55% of residents report a high degree of social isolation, vs. ~30% in high-amenity suburbs. Residents living in high-amenity urban neighborhoods are twice as likely to trust their neighbors and coworkers, and to trust and have confidence in their local government. | Affordability can be a challenge in high-amenity neighborhoods due to the limited supply of overall housing that is available in these areas. Only 23% of Americans live in high-amenity neighborhoods and, accordingly, these communities command a premium price. Policies and actions should seek to both increase the supply of housing in high-amenity neighborhoods and to equitably distribute high-amenity neighborhoods throughout the City. Care must be taken to minimize or prevent displacement and increase affordability of housing in high-amenity neighborhoods to within reach of a greater share of households. | Denser land use patterns result in increased use of active transportation and transit, reducing impacts associated with motor vehicle use. See Sustainability #3S.                      | Care must be taken to ensure an equitable process by which land uses change to facilitate high-amenity neighborhoods. The end result is certainly far more equitable than today, but the process could be disruptive to vulnerable populations if left to market forces alone. |
| 2 | Require that new housing projects contribute to the creation of a walkable and bike- friendly environment by providing infrastructure and connections that make it easier for people to walk or bike to destinations such as parks, schools, commercial services, and neighborhood gathering places.           | See #1L above.   | Extracting the cost of constructing new public livability infrastructure from private investment in new housing directly increases the cost of developments which is always passed on to tenants or buyers, or may reduce the scale of a development to fit within available financing, which could lead to fewer housing units being added, reducing the ability of the development to moderate aggregate housing prices City-wide. Care must be taken to ensure policies do not undermine  | New active transportation infrastructure will result in increased use of active transportation and transit, reducing impacts associated with motor vehicle use. See Sustainability #3S. | See #1E above.   |

|   |   |  | other policies. Guidance may be appropriate for prioritizing policies under certain conditions, such as housing emergencies.   |   |  |
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| 3 | Administer development code standards that require the design and/or siting of new housing such that units have access to adequate light and air and that multi-family units have access to open space either on-site or adjacent to the site.  | Require is a very strong word and implementations of this policy could run counter to other Livability lens objectives such as public open space, residences facing streets and sidewalks ("eyes on the street"), and walkability. Guidance may be appropriate for when to "require" certain features, or definitions or constraints that guarantee that "adequate light and space" provisions do not result in inefficient land use patterns. | Care should be taken that "adequate light and space" provisions are not used as justification to deliver fewer housing units or fewer affordable housing units than in a more efficient site development pattern that is equally feasible.   | See #3A left. Similarly, inefficient land use patterns tend to result in developments that are less energy efficient and where residents own more motor vehicles and drive more often.  | Care should be taken that "adequate light and space" provisions are defined in a manner that they can be distributed equitably without compromising other policy objectives.   |
| 4 | Regulate the size, shape, and/or position of new housing to ensure that it is similar in form to the housing that is permitted in the surrounding neighborhood, while meeting the intent of equity and affordability related housing policies.  | This is an excellent policy that seeks to bridge the divide to satisfy both "character" and "quantity" objectives. However, care should be taken that inefficient land use patterns that do not support other Livability objectives are not perpetuated to comply with this policy. See #1L above.   | Guidance may be appropriate for meeting affordability objectives. Large-lot/high-income neighborhoods may be suitable for tri- or quad-plexes that could be "affordable," but may not be equitable when considering transportation costs or access to services and amenities.  | See #3S above. However, attached housing (including plexes) is more energy-efficient than detached single family housing.   | Guidance may be appropriate for meeting equity objectives. An equitable distribution of housing could be interpreted as increasing equitable access to housing even in areas where lower-income or households or mobility-impaired residents may not have easy access to low-cost transportation or amenities. |
| 5 | Implement development or design requirements to help create transitions between lower and higher density residential development areas where the mass, size or scale of the developments differ substantially. Requirements could include massing, buffering, screening, height, or setback provisions. | Transition area design standards should not reduce development potential for the base zone. Intensity permitted by-right should be permitted to be transferred to other areas of the site without triggering a a variance process, excepting natural resource buffers.   | If transition area design standards reduce the housing potential of sites it will reduce the ability of these sites to fully contribute to the supply of housing, and will diminish the desirable impacts on affordability. Active measures may be required to guarantee that transition area developments include affordable units to offset the reduced contribution to the overall supply of housing. | Care should be taken that transition area design standards do not sacrifice the environmental, economic, or social aspects of sustainability. Limiting the scale, intensity, or housing potential for a site does impact all three aspects of sustainability. | Transition area design standards should not reduce an equitable distribution of housing or limit access to housing in high-amenity neighborhoods when compared to the base zone.   |