



Department of Planning and Development  
Jorge O. Elorza, Mayor | Bonnie Nickerson AICP, Director

## Questions and Comments Received During August 26, 2020 Public Meeting Regarding the City of Providence's Draft Anti-Displacement and Comprehensive Housing Strategy

*Public questions and comments submitted during the Q&A session of the August 26th virtual public meeting have been copied and pasted below. Answers that were provided in real time during the virtual public meeting have been provided below. Questions that were received during the virtual public meeting, but were not able to be answered live have also been copied and pasted below with followup answers provided.*

*Additional feedback received via email after the August 26 public meeting will be addressed throughout the plan, and responses will be provided individually where necessary.*

**Question:** Will the data that was used in making the recommendations that you will soon present be available along with this presentation?

**Live Answer Provided During Meeting (via chat window):** Hi Dwayne! Yes. A longer version of this presentation (that includes data) is now available on the project website at [www.providenceri.gov/planning/comprehensive-housing-strategy/](http://www.providenceri.gov/planning/comprehensive-housing-strategy/). This shorter version of the presentation as well as the live recording of this virtual meeting will also be available at that same link.

**Question:** My question right off the bat is, is this a planned project or is it now in full effect? How long before it actually exists? Is this meant to offset the fact that Elorza has announced that he's ok with the tax sales of minority owned property??

**Live Answer Provided During Meeting:** As we said at the beginning of the meeting, this process kicked off about a year ago. We started in late August when we brought Kyle [*Talente from RKG Associates*] and his team on board, so we have been working on this for about twelve months now. At the end of September is when we hope to issue the plan itself, or early October. This presentation is to say: here is where we are headed, here are our preliminary recommendations, and what feedback do you have? And then to incorporate that into the document, which is the plan itself, and it will be launched early September or early October. As you can see from what we walked through tonight, there are a series of things that we are recommending. As far as how long before it actually exists - each of those will be on its own time frame and some of the funding mechanisms we are hoping to launch soon. Some of the regulatory changes (zoning and the inspections) can be launched soon too. A lot of these don't have a dollar figure attached yet and some of those policy recommendations are just policies that we need to work through with our partners in the City Council and move forward with.



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*Follow up answer:* The Comprehensive Housing Strategy and annual tax sale process are not interrelated.

**Question:** Will the rental & homeownership assistance for rehabilitation be grants and/or forgivable loans? In addition to low-to-moderate incomes, many of our families also endure liquid asset poverty & taking on more debt would be a deterrent to applying for such assistance

**Live Answer Provided During Meeting:** We have talked about how to adjust these programs to be more widely available. We have an existing housing rehab program for owner occupants and one of the recommendations that has come out of the study is looking at the terms that we provide this assistance. When you offer grants or forgivable loans, it is only given out and spent once, and it doesn't revolve. One of the recommendations under this study was to potentially develop tiered assistance, really looking at the level of need and providing a suite of products that are tailored and potentially in some cases, for families that can afford it, carry an interest rate. By offering an interest rate, it could potentially be re-lent multiple times and attract outside investment. To build upon that, another recommendation coming out of this, which is not necessarily all of the resources used for rehabilitation, is to look at ways to try and recapture some of that money over time. Whether it is something that is paid back when the property is sold or refinanced or whether it is a time limit that it has to be refinanced back in, we have encouraged a number of options to the City to look at ways that the dollar can be re-spent on additional loans or additional rehabilitation projects. In other cities, where these leverage loan funds have been implemented, whether it has been a surprising benefit, is that the loans have spread across all income levels. They have not left out the very low income and they have gone all the way up in the areas where it is allowable up to 120%. Are we saying that every dollar has to be a loan? No. I do think there is an opportunity to leverage a portion of the City's investment, and there are lots of examples where families of all income levels can benefit even from a loan program.

**Question:** Hello, I'm wondering if the slides will be available to download afterwards [sic]; or if they can be emailed?

**Live Answer Provided During Meeting (via chat window):** Hello Pamela. The presentation is now available on the project website at [www.providenceri.gov/planning/comprehensive-housing-strategy/](http://www.providenceri.gov/planning/comprehensive-housing-strategy/). We will also post the recording of this session to the website after the meeting.

**Question:** Other than supply-side solutions (building more), what regulatory strategies were included in the plan (besides increased code enforcement). In particular, what of controlling rent fluctuations based on speculation, such as rent control and other policies to disincentivize real estate speculation. Also, reform of the Tax Stabilization Agreement system in Providence, which subsidizes luxury development, forgoes needed revenue from those who could most afford to pay, and almost never results in jobs or housing for the city's low-income families in communities of color?

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**Live Answer Provided During Meeting:** To speak specifically to the concept of rent control, based on the experience we have with other communities that we worked with in that process, unfortunately over time they have become distorted in terms of rent control stays with the unit and not with the tenant. From that perspective, there are situations where an individual who has the means then pays someone in a rent control unit to get on the lease and to qualify for that rate, live with them, and then when that person moves out then the unit stays rent controlled. It can be a challenging thing to do. The other side is it is proven to create disincentives for modernization and rehabilitation, and it creates deferred maintenance. The owner is not as willing to invest into it because they can't get the revenue out of it to justify those costs. The draft Strategy provides other solutions, which are much more effective, that address the same need without going down that route. For example, the rehabilitation program for rental units is one of the recommendations where you can provide resources to help property owners of rental units to make those improvements. Since the cost is deferred, then they do not have to have a substantial increase in the rent, and so as a result you are able to help hold down the cost of housing because the cost to the owner isn't as great. Another recommendation includes a local housing voucher that if resources ever become available then the City can implement its own, not a voucher tied to a unit but a household instead, that they can use and acquire price appropriate housing to gap the distance between market price and what they are able to pay. Finally, the strategy recommends that the City put affordability restrictions for access to financial subsidies (including the TSA program) so that incentives trigger a commitment to affordability. Those timelines can range based on the incentive and the targeted outcome. Ones that use Federal funds must adhere to HUD restrictions.

*Additional Follow Up Answer:* One of the policy strategies recommended in the draft Strategy is to require affordability commitments at or below 80% of Area Median Income (AMI) in order for developers to get an extended Tax Stabilization Agreement (TSA) term. The draft Strategy recommends requiring developers to meet 10% of all units at the 80% AMI level to get a 12-year commitment, with a sliding scale requiring larger percentage commitments for longer TSA terms. If enacted, this would tie the financial benefit of a TSA to a minimum delivery of affordable units. The City Council is working on an amendment to the TSA program that addresses many of these concerns.

**Question:** Also, when the city invests public (or private, charitable) funds into housing, how will we ensure that the housing's residents, not a real estate investor, corporation, or out-of-city or state landlord, are generating wealth from that property? How can we invest in community land trusts and resident cooperatives in the city to ensure not only wealth generation and foreclosure and market resistance, but also local control of our land and housing?

**Live Answer Provided During Meeting:** There is a recommendation in there *[regarding establishing a]* housing acquisition fund, which could easily be dove-tailed in partnership with a land trust or housing trust concept. We *[RKG]* feel that the recommendation to create resources

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for acquisition could be either held by the City or the PRA (the Providence Redevelopment Authority) or even through a partner. In many other communities that we [RKG] worked with, they have brought on a third party non-profit or even local housing authority as a partner, to be able to enter into those long-term land trust strategies, and they can hold onto the land and maintain that with a ownership by a trust but the structures owned by individuals to keep the overall cost of those units down. Then, they can enter into agreements with folks who rent or buy, so that those units stay affordable in perpetuity, in exchange for not having to buy the land. We think these recommendations are consistent with strategies like that, and if that's the direction that the City wants to go then it is already laid out in the plan.

**Question:** Who can I reach out to about partnering with the City?

**Live Answer Provided During Meeting:** Please reach out to Jessica Pflaumer, Principal Planner via email at [jpflaumer@providenceri.gov](mailto:jpflaumer@providenceri.gov), or via phone at 401-680-8519. She is working remotely and checking voicemail, but since she is not in the office everyday she will get back to you as soon as possible, but email is the best way to reach her.

**Question:** Thanks for this presentation. I am wondering how this plan has incorporated the needs of folks experiencing homelessness? Can anybody speak to how the City has conceptualized addressing this incredibly important issue and extending the anti-displacement policies to include those who are housing insecure or experiencing homelessness? A disproportionate number of people experiencing homelessness in the City are POC. Thanks for your time!

**Live Answer Provided During Meeting:** As we talked about earlier in the presentation, we engaged a number of partners and housing providers through this process, and that included a number of Providence's homeless providers, so their feedback was definitely taken into consideration in making this plan. A key finding that was mentioned earlier, is that there is a shortage at the lower end of the cost spectrum. That produces such a challenge for our many providers that are working diligently with homelessness to place them. The ultimate goal is to help people transition into permanent housing coupled with supportive services, and having a shortage of units that are affordable to those earning at or below 30% of area median income, creates such a huge challenge to providers. That is a critical production goal for the plan over the next ten years. By boosting that supply, we are making resources available for rental assistance and supportive services, so that there is a safe habitable place for people to rent and be available to them.

**Question:** What is the recommendation about student housing?

**Live Answer Provided During Meeting:** The recommendation, which was sort of answered earlier regarding the number of units allowed in each zone, identify areas where promoting student housing is appropriate and consistent with the character of the existing neighborhood. It focuses on trying to ensure that as investment or development or redevelopment or rehab is

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occurring, is being done in an area that is being targeted towards housing is allowed. For example, the removal of allotment rooms in R4 zoning, to be able to put more units that can then be done in a matter that is consistently creating housing for students. It needs to be sensitive of where it is located, the reality is as the institutions in providence thrive and, the need for additional housing will not just be consistent but will probably increase, so ignoring it will exacerbate the challenges and particularly affect the most vulnerable housing where they will become price competitive over the units that they already have.

**Question:** Are you willing to allow multi-family properties to convert 1st floor 2 or 3 bedroom units to convert to [sic] 2 separate 1 bedroom units?

**Live Answer Provided During Meeting:** Yes. It depends on which zone that you live in. For example, if you live in a R3 zone you already are allowed to have three units, if you live in R4 zone you're allowed to have more units, and if you live in a C-zone then you can have as many units as your property can. So, it really does depend on where you live but some of the zoning recommendations that we are thinking about is how do we create more units? So the idea of adding an ability to create an accessory dwelling unit is getting to the essence of the question is how do we allow for additional units within the same building fabric that we have? We are thinking about how you do that in a way that works with the neighborhood character that we have, but it is absolutely something that we want to allow for.

**Question:** to the producers: good idea to provide a glossary for novel terms such as “as [sic] valorem millage.”

**Live Answer Provided During Meeting:** This something that we are planning to do for the report itself. Thank you for the reminder to be more inclusive in the terminology we are using. The particular term that you asked to define is, “ad valorem millage.” The longer slide deck has a glossary, but it may or may not include this word. For reference, it is the tax on real property, tax on a piece of land, or a tax on a building on a piece of land.

**Question:** Why don't you convert more multi family buildings into condos so the lower income residents can own there [sic] apartment?

**Live Answer Provided During Meeting:** That is allowed. It is not something that the City does; we don't actually convert rental units into home ownership units, but that is absolutely allowed. If you have a multifamily building that is all rental units, as the developer or owner of the building, you can convert it into condominiums. There is a legal process to do that, but it is allowed. We [the City] regulate the number of dwelling units, but not whether it is an apartment or a condo.

**Question:** What role can colleges and universities play in addressing housing needs?



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**Live Answer Provided During Meeting:** Continue to engage with them and understand what their housing needs are, what their strategies around housing are, how the City can become a partner to them. Whether it is by modernizing existing dorms or finding ways to make it more regulatory to make those feasible investments. The greatest opportunity is through one of those investment funds or partnership arrangements that can be done in tandem, not just with universities, but all nonprofits. Universities or anchor institutions have played a critically viable role, and have been great investment partners by doing a variety of things to invest in community (physical assets on and around the campus, procurement strategies to create business opportunities for small business, especially minority businesses, and they also have a need to provide housing for their students and their workers). They have an invested interest in community development, and they would definitely be a primary partner to bring to the table. The colleges and universities can, should and are building more student housing which we are seeing quite a bit right now, so that does reduce the pressure on the surrounding neighborhoods by building more housing on their campuses. These campuses are not as closed off anymore with fences or parking garages on the street front, but instead we see universities being more open and a part of the community by providing that housing directly on the campus or around it nearby, which is a strategy a lot of them are pursuing.

**Question:** Will preference/incentives be available to developers that propose projects that address the needs Kyle discussed such as the need for affordable [sic] homeownership [sic] and the creation of income-based rental housing, specifically rental unity over 1 bedroom? I'm specifically thinking of the Citizen's [sic] Bank parcel redevelopment that Omni proposed mostly 1 bedroom rental units.

**Live Answer Provided During Meeting:** Theoretically from our recommendation, that's through the merit based allocation of the city's resources, looking at that decision matrix, and saying, "What are the priorities that we are trying to address with this particular resource or program? Where are the areas that we want to have the greatest impact," and use that to make determinations of which programs will make the greatest return or greatest value to the City and its residents. We are hoping the City moves towards a process of having multiple applicants coming for the same resources, rank them by number, and then explain that the City only has the resources to do these "x" amount of projects and these are the ones we chose based on impact. Like in the Charlotte model, what they have developed is opportunities for private developers or market rate developers to access low cost capital and incentives to provide affordable units at market rate development. We are interested in that because we want the lower income households or households of color to live in non low-income areas, and by providing these incentives to developers, is one way to do that.

**Question:** Any thoughts regarding strategies for seniors with home repair issues but want to age in place?

**Live Answer Provided During Meeting:** That did come up as a recommendation that we have a population that is growing older, over the next ten years, and a housing stock that is two- to

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three-families that doesn't lend itself well to people living in an aging place. Expanded housing rehab resources is a recommendation to provide modifications that may be needed or low barrier systems to make the improvements that they need to age in place. Creating priority or creating an earmark for particularly the aging population, senior citizens, to allow them to age in place is a critical strategy. Also, the universal design incentive for new design or relocation, so even if there aren't accessibility features at the time of construction, it can still create an opportunity for folks to have the choice to make improvements necessary when they want to age in place.

**Question:** How will sustainability aspects of housing be incorporated into the process (eg renewable energy, open space versus density, cooperative housing)?

**Live Answer Provided During Meeting:** I am sure that folks are aware that the City has a sustainability plan which has a lot of recommendations and this is an opportunity to make sure the housing plan is in sync with the sustainability plan. Open space vs density will always be a challenge for cities to strike the right balance of, but we did mention the idea of cooperative housing and land trusts, that are innovative recommendations we are open to. We are also thinking about what regulatory framework can be changed, if it is a barrier to those things. When it comes to density, we are allowing it so that it can be developed and increase the supply of units at all levels to provide more housing. The ultimate goal is to make sure that these two plans align accordingly.

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**Question:** Early in this presentation it was stated that in regards to production, that Studio and 1 bedrooms is what is needed. How was that determined? Meaning, who is saying that?

**Answer:** There is an important distinction for the gap analysis between higher income renter households and the lowest income renter households. These findings come from the supply and demand analysis as well as the affordability analysis conducted as part of this study. Providence has less than 18,000 rental units that are efficiencies or one-bedroom units; contrasting the more than 39,000 two-bedroom or larger units in Providence. However, the gap in supply and demand is more nuanced when considering income. From a pricing perspective, households earning over 100% of Area Median Income (AMI) are least served with efficiencies and one-bedroom units (more than a 2,300-unit shortage). In contrast, the City's lowest income households are least served by larger units (where there is an almost 5,500-unit shortage). Thus, from a new construction perspective, focusing on smaller units can alleviate pressure from higher income households consuming smaller units that are priced for moderate and lower income households. That said, focusing on mixed-income development should continue to be a priority for the City.



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**Question:** Has any consideration been given in addressing other non-housing factors that are contributing to displacement & challenges with being able to afford housing in Providence? In particular: connecting residents to support options to help them their incomes, rise up out of poverty, & other economic mobility programs that this body would not be able to address.

**Answer:** There absolutely is a connection between economic development and workforce development and housing affordability. As noted in the question, providing residents access to tools to increase their wages will increase their housing choice as well. This study focuses on the housing production, preservation, and affordability components. A separate analysis would need to be done to address those economic and workforce opportunities.

**Question:** How will this plan address other city policies or practices that contribute to and/or perpetuate the very displacement that this strategy is to address? For example, today it was announced that the City of Providence will hold a tax sale auction for various residential properties across the city, including properties in predominantly low-to-moderate & communities of color, & this practice of tax sale auctions (with private real estate investors as main participants) has significantly increased the displacement mentioned throughout the presentation.

**Answer:** We recognize the need to consider broad City policies and practices in our anti-displacement efforts. The City is committed to analyzing and amending our policies and practices to ensure that they are aligned with our anti-displacement goals.

**Question:** Has any consideration been given in addressing other non-housing factors that are contributing to displacement & challenges with being able to afford housing in Providence? In particular: connecting residents to support options to help them their incomes, rise up out of poverty, & other economic mobility programs that this body would not be able to address.

**Answer:** One of the intents of this Strategy document is for it to work in tandem with other initiatives and investments, such as the City's Consolidated Plan and Workforce Development investments. For further reference, the City of Providence's Consolidated Plan includes a greater discussion of community development needs and anti-poverty strategies to further support residents. The draft Strategy does, however, include several recommendations to help residents overcome some of the factors that contribute to displacement and affordability issues such as:

- Expand tenant advocacy support by publishing and providing materials that detail tenant rights and support organizations and continuing funding for eviction defense and advocacy organizations;
- Establish focused partnerships with banks or hospitals to achieve supportive services goals;
- Target specific investment areas while communicating with job creation and economic development activities to coordinate where targeted investment and outreach across housing and supportive services; and,





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- Collaborate with strategic partners who can contribute support that complements that City's investments and policies for affordable housing.

**Question:** How was this meeting publicized? How many are attending the meeting?

**Answer:** This meeting was publicized using the City of Providence Department of Planning and Development social media channels as well as through an email list of stakeholders and neighborhood groups, beginning two weeks prior to the meeting date. Nearly 100 residents and stakeholders joined the meeting.

**Question:** What metrics will be measured to determine if desired outcomes are being met for the strategy?

**Answer:** The strategy contains measurable goals for the preservation and new production of housing units on an annual and 10-year basis. There are a number of policy and regulatory changes recommended, and the City will track the successful implementation of those changes over the next 10 years.

**Question:** Will the City provide regular updates on the status & outcomes of this strategy? If yes, how & how many times over the duration of the 10-year strategy?

**Answer:** Annually, the City will assess the number of units created, and whether we have successfully implemented the policy and regulatory changes recommended. We will be monitoring emerging needs as they develop throughout the next decade. This will not be a static document, and it will provide the blueprint needed for production.

**Question:** Good evening - I am an outreach worker with people experiencing homelessness, and my clients' criminal legal history is often a barrier to housing (this is true for other overpoliced communities, too...). Could you speak to how the city plans to address this challenge?

**Answer:** As a funder of development, the City has leverage and opportunity to review and approve Tenant Selection Plans to ensure that Tenant Selection and rental policies are not undue barriers to fair housing choice.

**Question:** Wondering how the City defines neoliberalism and how/if it relates to the City's excitement around public-private partnership in urban planning?

**Answer:** The question is unclear, and does not appear to be directly related to the Comprehensive Housing Strategy

**Question:** Can you speak to what the enforcement components of this plan will be? These ideas have been largely [*sic*] present in the City for several years now and yet tax breaks have largely been given to



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luxury apartment development. Local real estate developers have made a concerted effort to relocate low income folks from more public spaces like Downtown, and from Kennedy Plaza, specifically.

**Answer:** These preliminary recommendations suggest that the City develop a decision matrix to guide investment of public dollars in private developments. This matrix can include characteristics including but not limited to type of development, affordability commitments, priority locations of development, and amount of public funding requested to determine the suitability of the project for public investment in a consistent and transparent way. The draft Strategy also recommends that the City consider performance requirement measures. These measures will require monitoring, but will enable clawback requirements for projects that do not meet their agreements.

**Question:** How does the City define “resident”? When discussing the health, economic, and safety [sic] goals of residents, does that include folks who experience homelessness within the City? Will those folks be included as stakeholders in this plan?

**Answer:** This Plan includes prioritization for the City’s most vulnerable. During the preparation of this draft Strategy, intensive focus groups were held with homeless and special needs service providers to discuss barriers that exist in securing permanent housing for those experiencing homelessness in Providence. This draft Strategy contains recommendations to boost the supply of existing rental housing, as well as to create an additional, locally-funded housing voucher program targeted to those earning at or below 30% of area median income. Further, the Plan recommends the City take a leadership role in Source of Income protections to foster fair housing choice for subsidy recipients.

**Question:** After the full written plan is released, in which we can read all of the details of the plan, if items of the plan are identified to be a concern or problem for the City's residents, will there be any opportunity for changes to the plan during its 10-year duration?

**Answer:** The Anti-Displacement and Comprehensive Housing Strategy will absolutely be able to be (and should be) modified to adapt to changing ideas and needs over time.

**Question:** on one slide there was a reference to tying requirements to Tax stabilization agreements but kyle didnt [sic] go into specifics on that- what sort of requirements did you have in mind?

**Answer:** One of the policy strategies recommended in the draft Strategy is to require affordability commitments at or below 80% of Area Median Income (AMI) in order for developers to get an extended Tax Stabilization Agreement (TSA) term. The draft Strategy recommends requiring developers to meet 10% of all units at the 80% AMI level to get a 12-year commitment, with a sliding scale requiring larger percentage commitments for longer TSA terms. If enacted, this would tie the financial benefit of a TSA to a minimum delivery of affordable units.



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**Question:** How will sustainability aspects of housing be incorporated into the process (eg renewable energy, open space versus density, cooperative housing)?

**Answer:** One of the new programs and policies recommendations in the draft Strategy is to create a stand-alone energy efficiency rehabilitation fund that can be combined with other programs like the Lead Abatement or existing Home Repair program. The energy efficiency program would provide resources to property owners to perform energy efficiency and healthy homes updates, and is a strong candidate for an investment fund with healthcare partners. One challenge the City must face is balancing open space and density. Ultimately, the City must define its optimal open space versus density thresholds considering the impacts on all perspectives. However, continued development of residential units within Providence will be necessary to maintain and promote greater affordability and housing choice.

**Question:** How will this plan affect Section 8 housing? Will any component of this housing plan incorporate rapid rehousing for folks experiencing homelessness?

**Answer:** Recommendations to improve the City's rental housing stock, invest in lead-based paint remediation and energy efficiency, and promote Source of Income Protections are all anticipated to positively affect the ability to utilize the existing supply of Section 8 vouchers administered by the Providence Housing Authority. Rapid rehousing assistance for those experiencing homelessness is anticipated to continue to be a priority throughout the Plan period with ESG funds the City receives from HUD. Additionally, the Strategy's preliminary recommendations call for the creation of a local Tenant-Based Rental Assistance program using local revenue sources to augment federal housing voucher programs. It is recommended that this voucher program be targeted to those earning at or below 30% of area median income.

**Question:** Beyond the provisions for mixed income development and low income homeowner assistance, are there any anti-displacement strategies in the plan for renters in existing private housing that may experience rent increases?

**Answer:** The Strategy recommends increasing rehabilitation programs for existing private housing units. When providing such assistance, the City can impose restrictions on landlords to provide protections against displacement. As an example, the City's existing Lead Safe Providence Program imposes long-term post-rehab requirements that improved units be rented at or below Fair Market Rent, and that rental preference be provided to families with children. Provisions such as this can be expanded and adapted across programs.

**Question:** Are the longer term TSA extensions that are proposed to be tied to affordability intended to be connected to the Administrative Neighborhood Tax Stabilization program (or would this be a traditional TSA, where you need to appear before city council)?



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**Answer:** The strategy recommends that the City consider requiring greater affordability commitments for developers to achieve longer Tax Stabilization Agreement (TSA) terms. From an implementation perspective, making the relationship between length of TSAs and affordability commitments formulaic (and potentially administratively approved) will increase its impact because it will reduce timelines for approval and unpredictability of a long process. Any administrative approval (and therefore formulaic incentive) should be thoroughly vetted before being implemented.

**Question:** What is the plan for accessory dwelling units? Will it be limited to extended family (i.e. in-law apt) or will it be available to non-related renters in the mkt, perhaps with conditions of affordability

**Answer:** One of the zoning strategies recommended in the draft Strategy is to improve accessory dwelling unit (ADU) regulations by amending the City's Zoning Ordinance to allow ADUs in accessory structures (such as detached garages) under certain conditions and removing age and family restrictions. If enacted, this would create new, affordable housing and offer opportunities for owners to reduce cost burdens and age in place; however, any such changes would need to be done with conditions to ensure ADUs are site appropriate, sustainable, and that external egress and property set back requirements are addressed. One such way to address site appropriateness is to establish a maximum ADU size as a percentage of the existing total living area.

**Question:** Re: the rental registry program, what would be the timeline for owners to register their units, and what penalty would there be for not registering a rental unit, or not keeping a unit up to Code?

**Answer:** The finer details of the program are yet to be determined as the City continues to explore possible solutions that best meet the needs of residents. There could be financial penalties for not registering units and not keeping units up to code if it is determined that such penalties are appropriate for Providence.

**Question:** Would you consider allowing multiple, detached units on a single residential parcel, or other changes, that would allow "cottage courts" by right — or other developments that give similar housing choice options?

**Answer:** The Strategy provides several zoning recommendations to increase flexibility for infill development, cluster development, accessory dwelling units (ADUs), and conversions of triple decker houses with large 3- or 4-bedroom units to more one-bedroom units. Each of these recommendations are intended to balance the existing character of neighborhoods with creating flexibility to find solutions that reduce the cost of development (and therefore the cost of housing). For example, one of the preliminary recommendations calls for allowing rowhouse/townhouse development in R-1 and R-2 residential zones in certain circumstances. Another is to allow cluster development (the grouping of residential properties on a development site in order to use extra land as open space, recreation, or agriculture) in R-1A

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and R-1 residential zones in order to promote infill development and price diversity. Each of these recommendations offer solutions aimed to encourage compatible development through criteria such as design requirements.

**Question:** Has the city considered deeding properties for a nominal cost to CDCs as they did in the past? Our development costs are significantly higher because of HUD regulations.

**Answer:** While City ownership of residential property is limited, the Providence Redevelopment Agency routinely works with non-profit developers to landbank or convey residential properties for redevelopment as affordable housing. The draft Strategy also recommends that the City create a dedicated fund for property acquisition for housing, land assemblage, and preservation of existing affordable housing units.

**Question:** How does the City plan to get the word out to our communities about these changes and new programs? Especially those who may not speak English, those with limited literacy, and those who do not use social media or internet regularly?

**Answer:** The City will use its Communications teams to develop multilingual brochures and social media posts to inform our communities about these changes and programs. We will also use our connections with neighborhood associations, non-profit groups, and other partnerships to reach as many people as possible via printed materials and media outlets.

**Question:** Will any plans be made, maybe as part of improving landlord-tenant relations, to establish a program to help low-income renters find affordable units on the private market?

**Answer:** Rhode Island Housing has created a centralized listing service for privately-marketed workforce-priced rental units: <http://www.housingsearchri.org/>. The City will encourage property owners assisted through its various programs to list properties for sale or rent through this free, centralized service.

**Question:** Do we have a plan create a sustained and reliable fund for housing affordability we currently only have a block grant at this point, that is not going to be permanently implemented - only has been for 2-3 yrs. - MA: spends \$100/capita, CT \$95, VT \$75 vs RI \$22/capita. Alongside this, are we planning to bring Rhode Islands budget into a range that is closer to what other states are doing?

**Answer:** As part of the City's recent commitment to create sustained, reliable funding for affordable housing, 10% of property tax payments from properties with a Tax Stabilization Agreement (TSA) will now be contributed to the Housing Trust managed by the Providence Redevelopment Agency to support housing acquisition and disposition, lending and financing, new construction of affordable housing, and rehabilitation of affordable housing. Additionally, a policy strategy recommended in the draft Strategy is for the City and its partners to form a coalition to advocate for an annual commitment of housing funds from the State. This could be



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in the form of regular bonding; however, annual general fund appropriation would have the greatest impact in increasing resources available for housing issues, supporting programs, and ensuring that housing activity outside of Providence also benefits Providence.

**Question:** How can we use PILOT payments by universities and hospitals more effectively ?

**Answer:** Colleges and Universities have a role to play in the implementation of the City's Comprehensive Housing Strategy. The City will evaluate whether a portion of the annual PILOT payments can be dedicated to housing production.

**Question:** Ambitious plans by the city! As you mention, Providence has an affordability issue exacerbated by lack of applicable housing throughout the city neighborhoods. This also applies to the state which has resulted in segregation via concentrated poverty in a few neighborhoods in Prov. neighborhoods and only some other cities. Can you speak to collaboration with the state to ensure affordability across the state? Prov shouldn't tackle these issues by itself

**Answer:** One of the policy strategies recommended in the draft Strategy is for the City and its partners to advocate for an annual commitment of housing funds from the State. This could be in the form of regular bonding; however, annual general fund appropriation would have the greatest impact in increasing resources available for housing issues, supporting programs, and ensuring that housing activity outside of Providence also benefits Providence.

**Question:** Are you going to look at up-zoning opportunity neighborhoods, particularly on the east side to allow small multifamily homes as is being done in Oregon, Minneapolis, Vermont, Portland, etc.

**Answer:** The draft Strategy recommends several zoning-related changes including:

- Establishing a bonus density program that would offer residential developers more units than typically allowed by-right in exchange for a minimum percentage of affordability. This would create more income-controlled units in the City while maximizing limited land resources. The affordable units required could be targeted as low as 50% of Area Median Income (AMI) for rental of 70% for owner-occupied units.
- Eliminating the merger provision that automatically joins substandard lots while creating a pre-approved design to allow for infill housing on substandard lots. This would activate small lots for new infill development while using pre-approved architectural designs to help snake development is complementary to adjacent properties.
- Amending the Zoning Ordinance to allow rowhouses in R-1 and R-2 residential zones (under conditions that ensure design-scale cohesion and affordability measures such as at least one rowhouse unit being designated as income-controlled).



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- Allowing cluster development (the grouping of residential properties on a development site in order to use extra land as open space, recreation, or agriculture) in R-1A and R-1 residential zones in order to promote infill development and price diversity while protecting the integrity of neighborhoods through design requirements.
- Removing minimum lot size requirements for R-4 multifamily residential zones to promote additional housing development.

**Question:** Our experience operating apartment buildings has our operating costs often north of 40%, lowering operating [*sic*] costs (particularly taxes) would be helpful. The city taxes apartment buildings at more than twice the rate of single-family homes. It seems like it would be helpful to rebalance our commercial tax base to encourage new and rehabilitated construction while increasing taxes on vacant and under-utilized properties to increase their carrying costs and push them to do something with more public benefit.

**Answer:** One of the policy strategies recommended in the draft Strategy is for the City to create a multifamily residential millage rate between residential and commercial rates. This would ease the financial burden on existing and new non-owner-occupied multifamily buildings and projects, lead to greater affordability, and reduce pressure on new construction; however, this could have a financial impact on the City's budget and would need to be further evaluated to balance benefits to property owners with cost to the City.

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