

Historic Preservation and Affordable Housing:

Preservationists' views on challenges, tools, and responsibility

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Introduction

Housing affordability is a challenging subject to evaluate. What constitutes "affordable" is entirely dependent upon the income of the individual household. Everything is affordable for Bill Gates; very little is affordable for workers making minimum wage. But, a challenging research area or not, affordability and the housing crisis is a growing problem in every region in the country. Local historic districts are often blamed for high housing costs, an argument that is absurd on its face, as in most cities more than 95% of land area is not subject to historic district regulation. While historic preservation is certainly not responsible for the rising cost of housing, that doesn't mean there isn't a connection between historic districts and affordability. That connection, and how it is perceived by preservation professionals, was the focus of this survey.

Respondents to this survey were primarily professionals working in historic preservation. Inherently, these respondents answered the questions based in large measure from their own perspectives as heritage professionals, which it bears pointing out is not a particularly high-earning field. Consider graduates of the University of Pennsylvania. MBA graduates from the Wharton School had average starting salaries last year of \$150,000. Across campus, graduates with Masters' Degrees in Historic Preservation left Penn with the same number of years of education, the same amount of student debt, but with average salaries less than a third of their business school peers. There are many, probably most, historic preservation professionals who have worked their entire lives in the field who have never earned in a year those MBA grads' first year salaries. This also means that the people devoting their professional careers to being stewards of their community's built heritage, may themselves struggle to afford housing in specific cities or neighborhoods.

This information is relevant in terms of contextualizing the survey results, which was not intended to be a comprehensive analysis of the affordable housing issue, but rather to learn from preservationists the magnitude of the housing affordability issue in their community and any links they saw between that issue and historic preservation. If anything, the sobering results mean that preservationists want to be involved in any response to the affordable housing crisis.

In response to feedback from our last PresPoll, we included an open-ended question at the end of this survey in which survey respondents could make any comment they wished. This proved to be one of the more fruitful questions of the survey, and all of the comments are included, verbatim, in this report. It is clear from the responses that professional preservationists have already given a significant amount of thought to this challenging issue.

PlaceEconomics and our companion firm, Heritage Strategies International, work at the intersection of historic resources and economics. To inform our own research, but also to provide insights to those working in the field of heritage conservation, we periodically conduct online surveys which we call *PresPolls*. These surveys are conducted using Survey Monkey, a link to which is provided through our direct mail list and through social media.

This poll asked about the connections, if any, between historic preservation and affordable housing. Links to the survey were provided in our three Facebook pages (PlaceEconomics, Heritage Strategies International, and Donovan Rypkema) as well as on the Facebook page of Historic Preservation Professionals. Additionally, we sent a link to the survey to our international mailing list of more than

6,000. The survey was open from May 3 through May 7. One hundred ninety-six responses were received.

We learned a lot from this survey. It is our hope that you do as well.

Key Findings

Based on the responses of 196 survey participants, here are the eleven most significant findings:

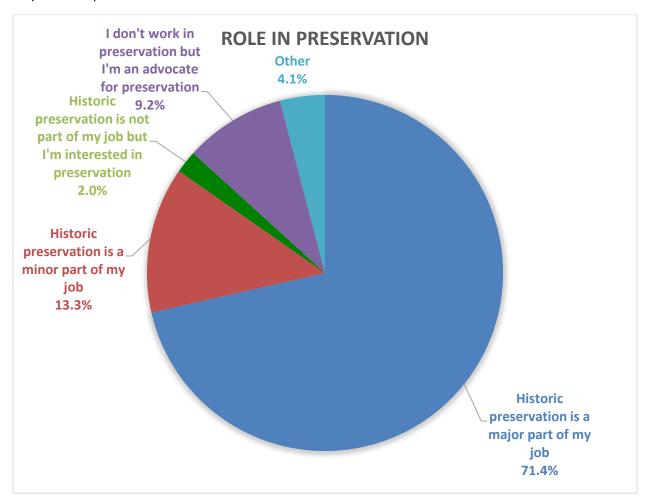
- 1. Housing affordability is at the crisis level in most communities. (See Question 3)
- 2. While affordable housing is a challenge in most places, the larger the city the greater the problem. (See Question 3)
- 3. When asked about the affordability of historic districts, nearly half (43.6%) said that historic districts were "Not Affordable" as compared to the rest of the city. (See Question 4).
- 4. A large share of respondents from both large cities and small towns put historic districts in the "Not Affordable" category. (See Question 4)
- 5. Older, non-designated neighborhoods came out significantly better on relative affordability, with only 18.0% saying those neighborhoods were "Not Affordable" while 24.7% identified them as "Affordable" and 7.7% "Very Affordable." (See Question 5)
- 6. When asked to identify possible connections between affordability and historic preservation, more than half (53.3%) of the respondents identified the "Lack of financial incentives and other tools that make preservation more affordable" as a key issue. (See Question 6)
- 7. The idea that "Design guidelines reduce the threat of demolition of affordable housing stock" was characterized as "Largely not the case in my community" by 40.6% of respondents. (See Question 6)
- 8. The most common preservation tool seen to aid affordability was "Grants for Repairs" cited by 33.3% of poll takers. (See Question 7)
- 9. "Grants for Repairs" was also judged the most effective affordability tool by 73.7% of respondents. (See Question 8)
- 10. Even though only 16.9% of respondents reported that their city had "Policies encouraging retention of older housing, regardless of whether designated or not," 55.1% thought such policies would be "Very Effective" in improving affordability. (See Question 8)
- 11. Almost two-thirds (62.1%) felt that preservationists should not just be addressing issues of affordability, but should be leading that effort.

Housing affordability is a crisis level problem. Historic districts are not the cause of the affordability crisis but are disproportionately being affected. Preservationists feel a responsibility to lead efforts to address the issue, but are lacking a wide range of effective tools. Even current tools, like design guidelines, are not effective in mitigating the demolition of affordable housing. There is a strong feeling among preservationists that their efforts should not be limited to historic buildings, but also to long-time residents who occupy them. There is also wide recognition that it is not just architecturally significant housing that should be saved, but older housing in general, which often provides the majority of naturally occurring affordable housing (NOAH). The notion that the retention and rehabilitation of older housing stock is critical to addressing the affordability crisis is supported outside the preservation field as well, and is specifically mentioned in President Biden's new American Jobs Plan.

There are no easy answers to the housing affordability crisis. As one respondent succinctly put it, "It's a complicated issue." But complications aside, preservationists recognize the problem and are eager to be part of the solution.

Question 1 – What is your historic preservation role?

As intended, the overwhelming majority of survey respondents work in the field of historic preservation. More than 7 in 10 said preservation was a major part of their job and another 13% reported that preservation was a minor part of the job. The balance revealed an active interest in preservation among whom 4% fell into the "other" category. "Other" responses are listed below. An option was provided saying, "Historic preservation is not an issue I'm involved with either personally or professionally" but no respondent opted for that answer.



"Other" Responses

- I am a retired planner who worked at the local, state, regional, and federal levels. Preservation was always part of my job.
- I understand and appreciate the need for preservation but...
- Current HP student, former employee architecture firm dealing with housing, hoping to get fully into preservation practice/theory
- Student

- Volunteer
- I sit on a municipal historic preservation board as a community representative
- Degree holder in Historic Preservation but not currently working in the industry
- On my local preservation non-profit Board. It is a full time job in itself, but I'm learning that no one in preservation sees this as a "real job." I am a trained preservationist, but I'm consistently treated as "less than" a preservationist with a job title, even though I'm often doing far more than other organizations.

Question 2 – What is the size of the city you live in?

Towns and cities of all sizes were represented among the survey respondents, although the largest single cohort was from cities with populations between 250,000 and 1,000,000. In the US there are 80 cities with a population in that range, home to a total of 36.2 million people. The second largest group of respondents was from cities larger than 1 million, of which there are 10 in the US, with a total combined population of 26.9 million.



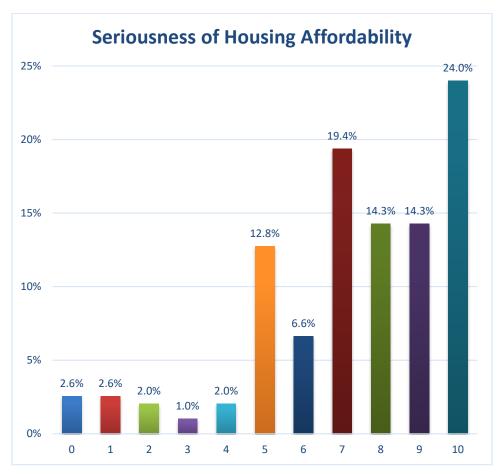
Question 3 – How serious is the housing affordability issue in the city you live in?

To answer this question, respondents chose a point on a scale from 0 to 10. At each end of the scale was a descriptor, at the low end being "Housing affordability is not a problem in my community" and at the high end, "Housing affordability is at a crisis point in my community." Center on the scale was the statement, "Housing affordability is a problem but not a crisis."

Housing affordability is not a problem in my community

Housing affordability is a problem but not a crisis

Housing affordability is at a crisis point in my community The magnitude of the problem was clearly shown in the responses to the question. If the responses are combined into three groups constituting "not a problem (0-3)," "problem but not crisis (4-6)," and "crisis (7-10)," the results are alarming. Only 8.2% fell into the "not a problem" category while 72.0%, or nine times as many, reported that housing affordability was in the "crisis" range in their cities. Almost a quarter (24%) of respondents rated the seriousness of the problem at the highest level of 10.

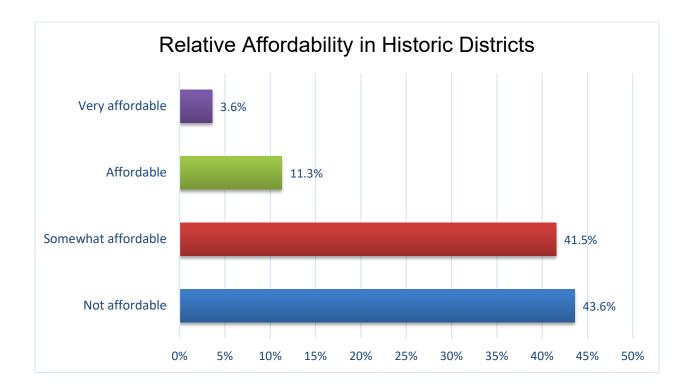


While cities of all sizes reported an affordable housing problem, there was a general correlation between the size of the city and the perceived magnitude of the problem, meaning, the larger the city, the more serious the problem. The single exception to this pattern was found in cities 25,000 and smaller who had slightly higher "seriousness" scores than the two larger groupings of cities.

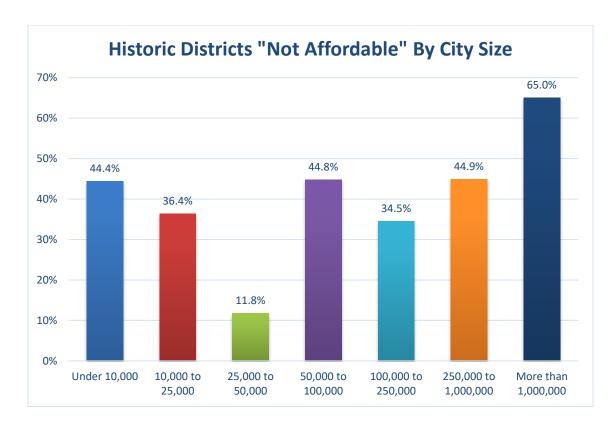


Question 4 – Relative to the rest of the city, how affordable is housing in historic districts in your community?

How affordable is housing in historic districts? Not very, according to these preservation professionals. More than 4 in 10 (43.6%) report that relative to the rest of the city, historic districts are not affordable. This compares with those who said these historic neighborhoods were affordable or very affordable, which totaled just under 15% (14.9%).

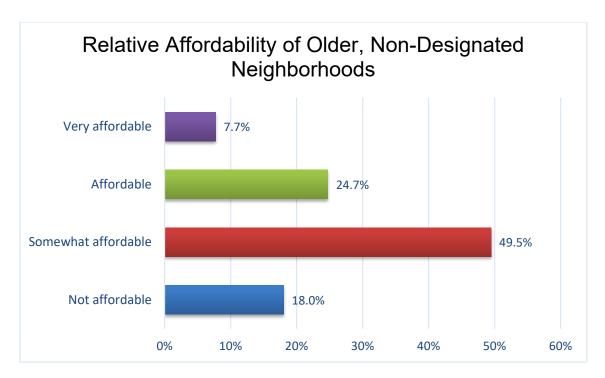


The degree to which historic districts were deemed "not affordable" varied greatly by city size, however. Cities with populations between 25,000 and 50,000 had the fewest "not affordable" responses at 11.8%. Nearly two-thirds (65.0%) of respondents from the largest cities said that housing in historic districts was not affordable.

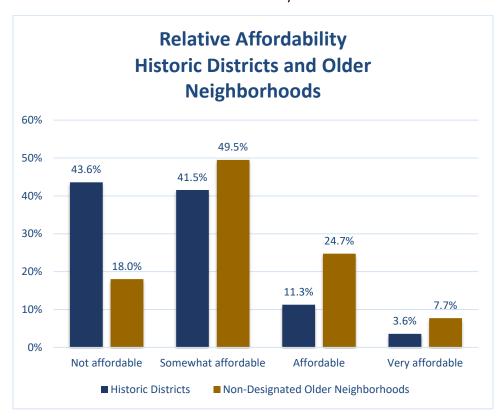


Question 5 – Relative to the rest of the city, how affordable is housing in older, non-designated neighborhoods in your community?

Some local preservationists have become advocates for maintaining older housing stock, whether or not it is deemed significant enough for historic district protection and accompanying design guidelines. For some, the rationale stems from environmental reasons—many cite the sustainable development benefits of reusing rather than razing existing buildings. Others make the case for keeping older structures as a way to maintain naturally occurring affordable housing, or NOAH. In many cities, non-designated older neighborhoods are a major provider of such unsubsidized affordable housing. Nearly a third (32.4%) said that this older, non-designated housing was either Affordable or Very Affordable.

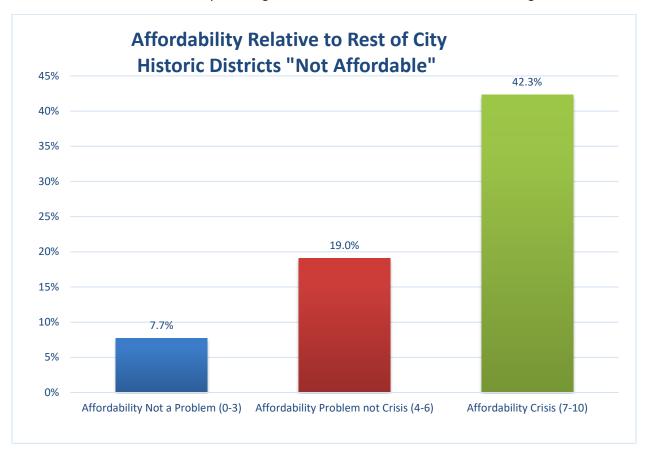


The differences between historic districts and non-designated older neighborhoods becomes even more apparent when the numbers are directly compared. While 43.6% of respondents reported historic districts in the "Not Affordable" category, only 18% said the same about older, non-designated neighborhoods. At the other end of the scale, more than twice as many saw older neighborhoods as "Very Affordable" than described historic districts that way.

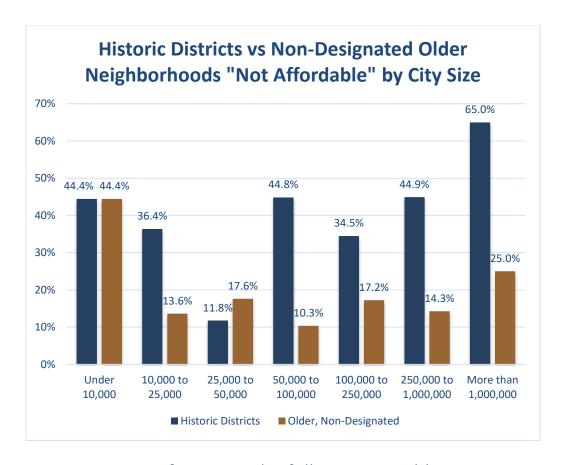


Perhaps not surprisingly, the relative affordability of housing in historic districts correlated with the seriousness of the overall housing affordability situation. For those respondents who fell into the "Affordability Not a Problem" category (those who gave scores of 0 though 3 on the Seriousness of the Problem scale) only 7.7% reported that historic district housing was not affordable. For those who saw affordable housing as a crisis (those who give scores of 7 though 10 on the Seriousness of the Problem scale) 42.3% said historic district housing was not affordable.

What this suggests is that as the housing affordability problem becomes greater, historic districts are affected both in absolute and relative measurements. Lack of affordability in historic districts seems to correlate with overall affordability challenges rather than as the cause of those challenges.



When comparing the percentage of "Not Affordable" responses for historic districts versus older, non-designated neighborhoods, in most cases a far smaller share of respondents saw housing in older non-designated areas as not affordable. In the smallest communities there was an equivalency between two type types of neighborhoods, while in a single instance – cities between 25,000 and 50,000 – historic districts had a lower "Not Affordable" rate.



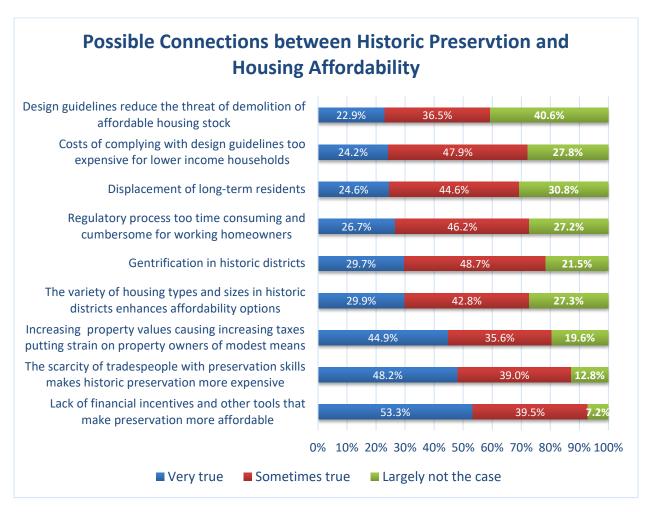
Question 6 – How significant are the following possible connections between historic preservation and housing affordability as they pertain to your community?

While a series of possible connections were explored between historic preservation and housing affordability, perhaps the most interesting responses for this question came from Question 10, which allowed respondents to make general comments. Several of those comments related to the potential reasons historic districts may be less affordable. All of the responses to Question 10 are included later in this report, but below are some of the germane comments identifying possible connections.

- Real Estate market is driving pricing and affordability not policy. HP guidelines and zoning are saving buildings and sometimes mitigating very poor building decisions. The U.S. has a mobility/ migration problem.
- In most communities, including mine, this issue has nothing to do with historic
 districts/designation. It is a complicated web of community desirability, access to
 transportation, more builders than rehabbers, lack of political will to save what is perceived as
 outdated, substandard housing.
- In most places I know, the affordability of housing in historic districts is impacted by the poor quality of housing outside of historic districts. If demand for historic houses is high, prices and

- rents will be also. If more housing outside of historic areas were better, more varied, and well served by public transportation, housing affordability would improve.
- Strict adherence to SOI Standards for windows can significantly increase the cost of a small rehabilitation project. Section 106 does not differentiate between a \$10,000 homeowner rehab project and a \$10 million rehab of a multifamily property.
- Land costs are what drives prices. Also, global wealth.

Based on the alternatives presented in Question 6, the most significant reason that housing may be less affordable in historic districts is the "Lack of financial incentives and other tools that make preservation more affordable" which was cited as "Very true in my community" by more than half the respondents.

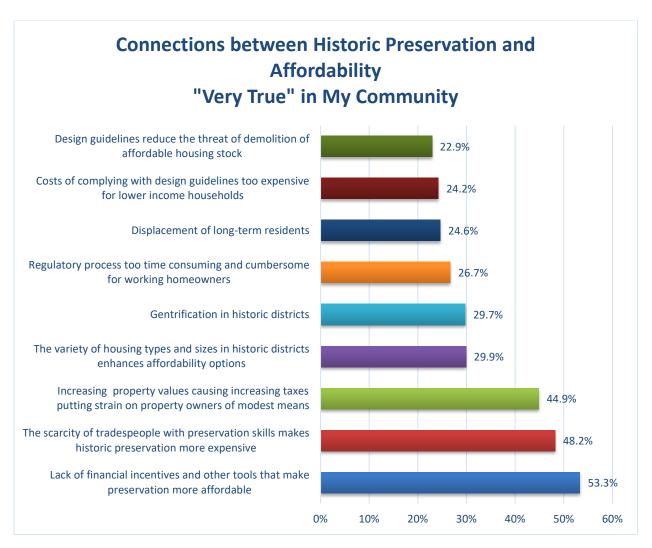


The second most frequent response was, "The scarcity of tradespeople with preservation skills makes historic preservation more expensive" which was noted by nearly half (48.2%) of survey takers. But an important caveat to that position was cited in the open-ended Question 10, where one respondent wrote this thoughtful response:

• I have an issue with "The scarcity of tradespeople with preservation skills makes historic preservation more expensive." I think this is a misperception. There is a scarcity but the implication is that more tradespeople equates lower cost. A lower cost means tradespeople get

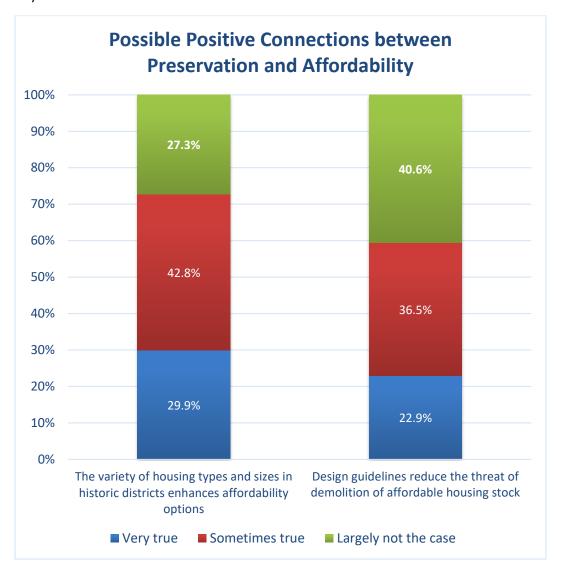
paid less via competition. I don't know any tradesperson who is pulling in a six-figure salary. The cost of the work comes from the nature of the work itself, not because tradespeople are charging exorbitant rates from supply-demand issues. If anything, a lack of tradespeople causes delays or makes it cheaper because people go to new construction options instead. These options usually ignore the complexities of actual restoration and are therefore cheaper.

Gentrification and displacement were both seen as a connection but in both cases by fewer than 30% identifying them as "Very True" in their communities.



Perhaps a disappointing finding was from the two options among the alternatives that suggested possible positive contributions of historic preservation in regard to affordability. Historic districts are frequently cited as having a greater diversity of housing types and therefore being more affordable to a wider range of households by income level. But fewer than a third of respondents (29.9%) said that it was "Very True" that "The variety of housing types and sizes in historic districts enhances affordability options." Almost as many (27.3%) said that was largely not true in their community.

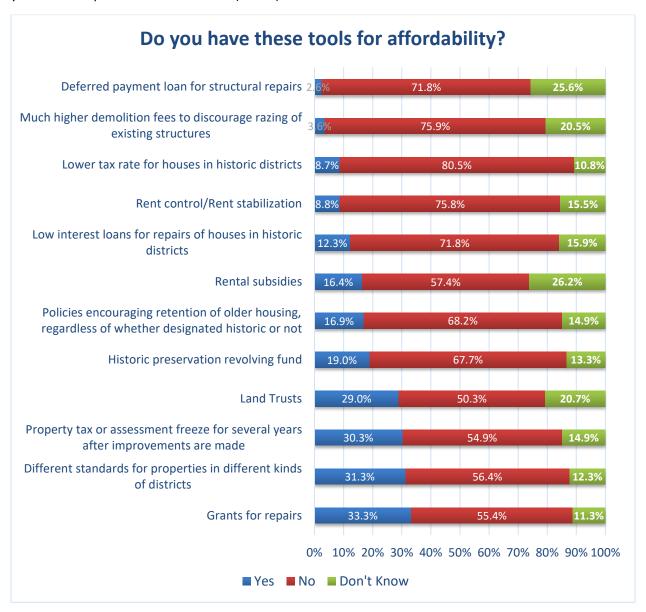
At least in theory, most design guidelines for historic districts limit the demolition that can take place. The argument is then made that this demolition restriction keeps the inventory of affordable historic properties in place. Apparently, those demolition restrictions are not working well. Less than a quarter (22.9%) agreed that "Design guidelines reduce the threat of demolition of affordable housing stock" was "Very True" in their communities. Almost twice as many (40.6%) said that was "Largely not the case" where they lived.



Question 7 – Here are some tools that have been used to ease the housing affordability problem. Which, if any, do you have in your community?

As noted earlier in Question 6, there was widespread agreement that there was a "Lack of financial incentives and other tools that make preservation more affordable." This response was reinforced in Question 7, in which results showed that none of the listed tools were available to more than a third of

the communities. The most common tools were "Grants for repairs" (33.3%), "Different standards for properties in different kinds of districts" (31.3%), and "Property tax or assessment freeze for several years after improvements are made" (30.3%).



Even those more common tools raised concerns from some of the survey takers in open ended responses, who answered:

- Matching grants or reimbursement grants are fine for wealthy owners, but don't work for people with lower wages or fixed income. People shouldn't be awarded grants only to have them revoked if they can't afford to match them--it's disingenuous and rewards those who can already afford repairs.
- The trend toward considering different standards and guidelines for different districts or survey ratings is a great concern for me. If it relates to differing historic character, like front yard fences vs. no

front fences that's ok. However, standards that do or don't allow vinyl windows in different districts erode the authority of an HPC, and I think it's asking for a lawsuit based on equal protection.

• Savvy middle-class and wealthier residents would jump on housing with lower tax levels and/or property tax freezes. I'm not sure these would actually help low-income residents or cause increased gentrification because the incentive is targeted at the building - not the individual. Wealthier residents can take advantage of these incentives (maybe more so) than lower-income residents.

Open-Ended Responses

Question 7 also had an open-ended response option that said, "Please list any tools for housing affordability used in your community not included above." Here are those responses.

- 2 nonprofits dedicated to negotiating prices, terms, and loans for lower income families. Both rely on federal programs to structure the loans with little state and no local assistance
- 25% Wisconsin state tax credit for rehabilitation of designated historic houses . . . for homeowners.
- ADUs allowed in historic districts, pairing of LIHTC and Preservation credits at state and national level. Ideas on how to discourage demolition, etc. but no policy movement yet.
- Affordable housing Trust Board helps first time home buyers with closing costs, etc.
- Block grants Nonprofits
- Community Development mostly demolishes and rebuilds.
- Current administration does not seem interested
- Developer incentives to retain a percentage of projects for "affordable" or workforce housing.
- Down payment assistance program (HUD funds); grants mentioned above are for 80% AMI only
- Entrepreneurial training programs and competitions. Note, our repair grants, deferred loans, and similar programs were temporarily suspended due to COVID-19
- First time home owner grants to help with down payments
- Free old house advice and low interest loans for bankable (even low income) homeowners. No grants though.
- Free old house workshops
- Grants to cover increased property tax assessments for low-income homeowners
- Habitat for humanity etc
- Historic Building Code
- historic tax credits for homeowners

- Houston is working on the legal framework to allow the creation of Conservation Districts, but there is no guarantee that the Council will approve, or that individual neighborhoods will adopt.
- Just Section 8
- LIHTC, Development fees,
- Linkage fees from development for affordable housing, but not associated with historic districts. Most of our local districts are in the pricey, downtown neighborhoods so developers are able to build their required affordable units in the outer, low-income neighborhoods instead.
- Mills Act
- Non-profit group Homewise has numerous assistance programs for home-ownership, but not tied to preservation. City of Santa Fe has rental assistance programs, but not tied to preservation.
- One small area of subsidized housing. That's it. Our community is failing epically in regards to affordable housing.
- Portion of affordable units required for any development requesting public subsidies, conservation and character overlays
- Properties with Mills Act (CA) contracts get lower tax rate; it's not automatic for historic districts.
- Reduced fees for developers building affordable housing
- section 8. easing of rules about accessory dwellings
- Significant bonuses for FAR and maximum height when developing new buildings that contain specific ratios of designated affordable housing.
- Some grants for affordable housing, but many times used on non-historic structures (for purchase or repair)
- state preservation homeowner tax credits
- State Residential Tax Credit Program
- State tax credit for residential, but that sunsets in 2022 and state legislature did not renew. They only renewed the commercial portion of the tax.
- Tax abatement available for historic properties that include affordable housing in their rehab
- Tax Credits
- The Preservation Society of Asheville has a revolving fund. It has been difficult to implement mainly because of our hot, hot housing market. We're focusing on underserved neighborhoods but the development pressure is so intense. Many houses are being sold to developers without ever going on the market.
- vouchers

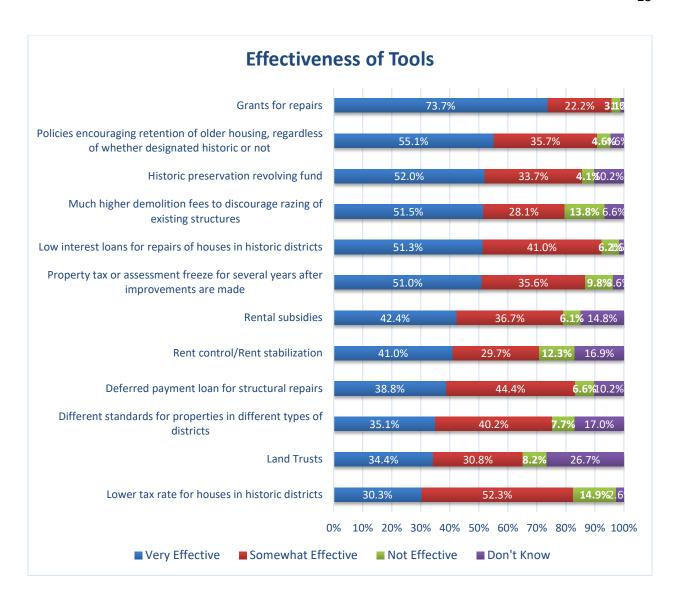
- We have a dedicated Housing Authority but they primarily retain apartment buildings and complexes. We are currently implementing a new Housing Strategic Plan that will likely expand the toolbox.
- We have habitat for humanity and homeless shelter, pastors/rectors at local churches pay run down motels directly for homeless to stay. Houses in HD are too valuable to bother with state and fed tax credits.
- We provided \$1mil to our local HP non-profit to establish a revolving fund for affordable housing. They use the funds to purchase naturally occurring affordable housing and rehab with no displacement and guarantee of the property remaining affordable for a minimum of 30 years.
- Zoning flexibility for preservation of landmarked properties; expedited administrative review of locally designated properties

Question 8 – Regardless of whether your community has these tools, how effective do you think they would be in addressing affordability in older and historic neighborhoods?

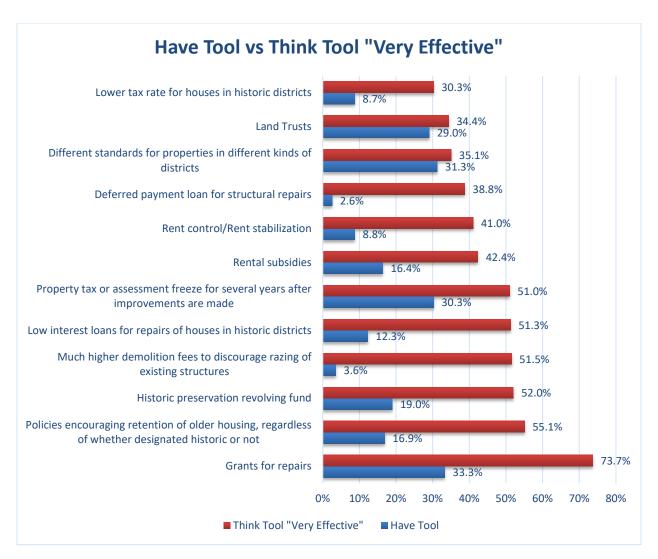
When the question was shifted from "what tools do you have?" to "what tools would be effective" the answers also shifted somewhat. "Grants for repairs" was the most common tool in use, but was also by far the tool that respondents felt would be most effective in addressing affordability in older and historic neighborhoods (73.7% "Very Effective").

The tool seen as the next most effective, wasn't an incentive, but "Policies encouraging retention of older housing, regardless of whether designated historic or not." This puts preservationists as advocates of keeping the existing building stock in place if at all possible, not for architectural merit, but for affordability. But there is a chance for definitional confusion here. As one of the knowledgeable respondents noted in Question 10, "I'm sure you're aware of this, but there is a terminology minefield in this relationship, as "housing preservation" is a commonly used phrase in affordable housing. But it simply means retention of affordably priced housing - it has nothing to do with preservation of buildings. https://nhc.org/policy-guide/affordable-rental-housing-preservation-the-basics/"

In all, there were six of the listed tools that more than half of the respondents felt would be "Very Effective." The others being: Historic preservation revolving fund; Much higher demolition fees to discourage razing of existing structures; Low interest loans for repairs of houses in historic districts; and Property tax or assessment freeze for several years after improvements are made."



Each of the tools was then compared to examine the difference between the share of respondents who had each tool and those that considered them "Very Effective." As was noted above, "Grants for Repairs" led both lists. The tool with the greatest gap between "Have" and deemed "Very Effective" was "Much higher demolition fees to discourage razing of existing structures" which only 3.6% of respondents said they had, but more than half (51.5%) felt would be "Very Effective."



For comparison purposes the "top three" tools in most often used, most effective, least known about and most know about are shown in the table below.

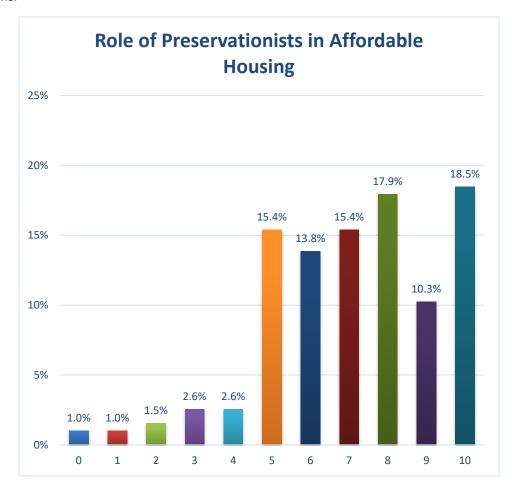
Most Commonly Used	Seen as Most Effective	Least Known About	Most Known About
Grants for repairs	Grants for repairs	Land Trusts	Grants for repairs
Different standards for properties in different kinds of districts	Policies encouraging retention of older housing, regardless of whether designated historic or not	Rental subsidies	Lower tax rate for houses in historic districts
Property tax or assessment freeze for several years after improvements are made	Historic preservation revolving fund	Deferred payment loan for structural repairs	Low interest loans for repairs of houses in historic districts

Question 9 – What role, if any, should preservationists be playing in addressing the issues of affordable housing?

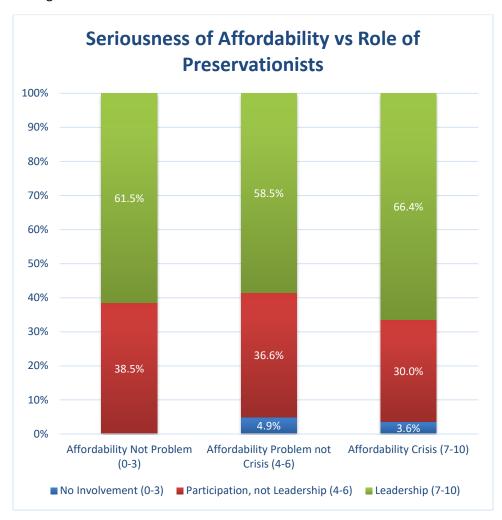
The survey provided a sliding scale (0-10) asking respondents to identify where on the sale they thought preservationists should be in addressing affordable housing issues. A descriptor on the low end said, "Preservationists should concentrate on preservation," a mid-scale sentence reading, "Preservationists should address affordable housing, but that should not be a primary role," and "Preservationists should be leading affordable housing efforts.



By very large margins, these professional preservationists think they and their colleagues should not just be part of the affordable housing discussion, but should be leading it. When these responses are consolidated into "No role" (0-3), "Participate but don't lead" (4-6) and "Lead the effort" (7-10), nearly two-thirds (62.1%) felt that preservationists should be at the head of the table in affordable housing discussions.



In Question 5 about the affordability of housing in historic districts, there was a great diversity among the answers from those in "Affordability not a problem" communities, residents of "Affordability a problem but not a crisis" cities, and "Affordability Crisis" locations. That was not true when asked about the involvement of preservationists in affordable housing issues. Regardless of how urgent affordable housing was in their community, over half of every group felt that preservationists should be leading affordable housing efforts.



Question 10 – What additional comments do you have regarding historic preservation and affordable housing?

The final PresPoll question was open ended, simply asking for any additional comments on this issue. Nearly half (49.7%) of all respondents chose to add additional comments, a far greater rate than is usually found for questions of this type. Nearly all responses reflected a thoughtful look at the issue and

evidenced significant thought has already gone into the connection between historic preservation and affordability.

In some cases, there were very different perceptions, as shown by these two comments:

- In most cases, new construction is better suited for affordable housing. The cost of adaptive reuse is virtually the same for market rate and affordable housing. Market rate is required to make the renovation cost pay for itself.
- The one area that could use more publicity is that the 20th century pre WW2 houses are smaller and more manageable to restore and rent; and it is the ultimate act of recycling to use these houses just as they were built, after whatever updating they might need.

To get a sense of any patterns in these responses, the comments were divided into seven categories: Tools, Strategies, Causes, Local Situation, Responsibilities of Preservationists, Political, and Definitions and Other. Here are some representative comments from each category:

Tools – All of the tools described in question 8, in order to be effective and not add to the displacement of long-time homeowners should have income restrictions and tenure requirements to qualify.

Strategies – As desirable areas, efforts should be made to retain affordability for long time residents.

Causes – Updating systems in old houses overwhelms many people. Their quick answer is to 'tear it down' and build 'better'.

Local Situation – My city has three local historic districts, 2 national register districts, no design guidelines, and no real penalty for demolishing or severely altering historic properties.

Responsibilities of Preservationists – *Preservation needs to be about preserving COMMUNITY character as much as it is about preserving buildings and sites.*

Political – Preservationists need to put the pressure on city governments to prioritize keeping historic districts affordable to the people who have historically lived in them, and to restrict short term rentals and house flippers

Definitions and Other – An issue is always the broad definition of and negative perception of 'affordable.' Do you mean worker housing, poor people housing, entry level homes, or ensuring income diversity in the community?

All of the responses are included just as they were received below.

Tools

- Matching grants or reimbursement grants are fine for wealthy owners, but don't work for people with lower wages or fixed income. People shouldn't be awarded grants only to have them revoked if they can't afford to match them--it's disingenuous and rewards those who can already afford repairs.
- "lower tax rates" not a legal or viable option in Wisconsin, per state statutes.

- I think there are a variety of tools that historic preservation can bring to the table, certainly including those specifically addressed in this survey. The key really is in tailoring grants, tax credits, low-interest loans, etc. to low-income owners and not just developers.
- My read of this poll was that it focused on local designation and local incentives but missed very important programs like the low-income housing tax credit. In upstate NY, partnership between the LIHTC and Historic Tax Credit has done more for both affordable housing and historic preservation than anything in this poll.
- Savvy middle-class and wealthier residents would jump on housing with lower tax levels and/or property tax freezes. I'm not sure these would actually help low-income residents or cause increased gentrification because the incentive is targeted at the building not the individual. Wealthier residents can take advantage of these incentives (maybe more so) than lower-income residents. Low-interest loans still typically require lender approval many low-income residents will not qualify unless the loans are coming from the city or directly through a revolving fund program run by a non-profit. Linked-deposit low-interest loan programs tend to benefit middle- and upper-income residents, rather than low-income residents. Finally, a key part of affordable housing is not just cost, but quality. Cheap, but unsafe or highly deteriorated housing is not enough.
- The trend toward considering different standards and guidelines for different districts or survey ratings is a great concern for me. If it relates to differing historic character, like front yard fences vs. no front fences that's ok. However standards that do or don't allow vinyl windows in different districts erode the authority of an HPC, and I think it's asking for a lawsuit based on equal protection.
- All of the tools described in question 8, in order to be effective and not add to the displacement of long-time homeowners should have income restrictions and tenure requirements to qualify.
- Tax freezes or abatement wouldn't work in our rural community. Our house was just reassessed at \$500,000 and they raised our taxes to \$1,250 a year. Embarrassingly low.
- Incentives for landlords to better maintain historic properties. District wide targeted preservation zoning measures. Grants for homeowners of historic housing stock. Financial incentives for repairing and maintaining.
- Upzoning and a move away from single family zoning should be a part of the conversation here.
- The challenge with incentives seems to be how to incentivize AFFORDABLE housing and not just more developers/rich white people coming in and taking advantage of the system to reduce their costs, while still gentrifying the area//raising property rates.
- The missing tool from your list is to elevate existing residents through training and improved self-reliance. Blending preservation efforts with entrepreneurial training and small business development allows existing residents to keep up with increased property values.

Strategies

• Partner with housing authorities, planning departments to development unified standards for projects involving older and /or historic properties

- Rather than addressing affordability in existing historic districts, we need to be thinking about how to protect resources in affordable neighborhoods without the financial hardships of formal designation. Many of the naturally affordable neighborhoods have great buildings but the owners don't have the means or motivation to invest in them. If we designated them, long-term residents would inevitably be pushed out, one way or another. So we need tools to protect historic fabric in low-income neighborhoods with rich character and fabric.
- It's complex and different communities have different factors affecting affordable housing and historic preservation. I think generally, historic or older pre-1940 buildings are more resilient and offer more options to realize affordable housing, assuming design review can accommodate typically necessary changes (basement egress, ADUs, etc.).
- The two go hand in hand just as HP fits comfortably within any and all conservation/climate change discussion/efforts. Preservation has traditionally done a terrible job of aligning itself with symbiotic issues. I can think of no greater/easier/more cost-effective solution to the affordable housing crisis than the reuse of existing structures. There isn't a city or town in this country that isn't awash with vacant, underutilized, deteriorated building stock, and it's about time to put those buildings to work, solving the immense and overwhelming need for affordable/workforce housing. Thanks for championing this effort!
- Affordable preservation and affordable housing should go hand in hand. We need to look at additional options such as encouraging/incentives for energy efficiency, location efficient mortgages, preserving housing stock, flexible design guidelines which encourage preservation and sympathetic restoration with an eye to adaptive reuse (ie, if a house was originally a single-family structure, preserve the look and details of the structure, but adapt it to multi family as one tool, which would also help lessen gentrification and enable older residents to remain in housing longer).
- Considering the threat of gentrification to "naturally-occurring" affordable housing, I strongly believe that preservationists should pair up with policy people to preserve land trusts/legacy homeowners/business owners. I struggle with the constant belief/practice of collaborating with developers who frequently (though surely not always) have more interest in investments/capital gains than community preservation/retention. Thanks!
- Preservation needs a clear message on this topic. Previously, increased or stabilized property values were one of the benefits to preservation, especially of districts. Districts and associated incentives attracted outside developers who rehabbed and let/sold at market rates or market premiums. A broader planning discussion is required. Maybe return to historic urban growth patterns that require more dense redevelopment to saturate the housing market and lower costs, while preservationists focus individual landmarks?
- multi family housing, adus need to be encouraged over sfh.
- I would love to see our SHPO (AL) recognize the need for and support Conservation Districts. I believe it would help save older housing stock and retain the streetscape here in areas where folks cannot afford to adhere to the stricter standards for historic rehab.
- preservation is perceived as reducing affordable housing in this community. would be nice if there was a boilerplate message or chart that clearly shows how preservation works to limit

gentrification and helps with affordability if all the tools are used not just designating a property or neighborhood as historic.

- A national policy.
- As desirable areas, efforts should be made to retain affordability for long time residents.
- The two are not really related. The one area that could use more publicity is that the 20th century pre WW2 houses are smaller and more manageable to restore and rent; and it is the ultimate act of recycling to use these houses just as they were built, after whatever updating they might need.
- Focus should be where housing in need it rehabbing is more concentrated. Fixes should included trades training for area students.
- The ideas of affordable housing and the retention of existing resources as a green solution need to be go hand in hand in all communities, even if design guidelines need to be relaxed in order to achieve this.
- My preservation based organization has been working to build relationships with nonprofits focused on affordable housing to get more involved in communities and work to make an impact that won't be a band-aid fix.
- Prioritize significant buildings and districts
- Once historic structures are gone, they are gone. Please start offering some of the items asked about in this survey! I myself am looking for a historic home to save, a small historic which are hard to find as so many have already been lost, yet they are perfect for singles or couples as households are smaller these days and some of us want the character of a historic home, but not the more common larger size...
- This is not one-size fits all. DC metro suburbs and other similar regions have limited space and need to urbanize. We need to focus on culture and legacy businesses rather than save every historic park and shop and garden apartment. However, less densely populated midwestern cities can certainly combine preservation and affordable housing forces.
- Perceived solutions (funding, planning, policies, housing elements, etc.) to affordable housing are primarily centered around production rather than retention/preservation/reinvestment of existing affordable housing/units. This is perhaps the biggest challenge as electeds are addressing this problem as if we can build our way toward a solution which isn't financially viable (new construction per unit costs too high) and often doesn't account for loss of existing affordable units, only those newly produced.
- Communities should see preservation as a benefit in the housing crisis. It should also help with addressing sustainability-long term goals.
- They should go hand-In-hand since they affect each other, but many cities seem to treat them as unrelated issues.

Causes

- In most cases, new construction is better suited for affordable housing. The cost of adaptive reuse is virtually the same for market rate and affordable housing. Market rate is required to make the renovation cost pay for itself.
- I have worked with a nationally recognized nonprofit to develop an affordable housing program that specifically uses older, existing housing stock. We had incredible difficulties with historic district guidelines. They vary so much, even within the same city, that there was no effective way to develop programs within any district. We did not consider homes within any district unless the city led all efforts, acquisition to handing over the keys to the new owners after restoration. Only one city ever did that (Savannah, GA). The program was ended a few years ago. We spoke briefly with Habitat for Humanity about rolling the program to them but they could not find a way to create a repeating plan that would work just about anywhere.
- Older building stock is underused. Real Estate market is driving pricing and affordability not policy. HP guidelines and zoning are saving buildings and sometimes mitigating very poor building decisions. The U.S. has a mobility/ migration problem. Just review Zillow and there are very affordable existing buildings throughout the mid-west.
- In most places I know, the affordability of housing in historic districts is impacted by the poor quality of housing outside of historic districts. If demand for historic houses is high, prices and rents will be also. If more housing outside of historic areas were better, more varied, and well served by public transportation, housing affordability would improve. Also, policies like allowing ADUs and multi-unit options within residential neighborhoods will help. Ultimately, affordability is related to supply and demand.
- In most communities, including mine, this issue has nothing to do with historic districts/designation. It is a complicated web of community desirability, access to transportation, more builders than rehabbers, lack of political will to save what is perceived as outdated, substandard housing.
- Strict adherence to SOI Standards for windows can significantly increase the cost of a small rehabilitation project. Section 106 does not differentiate between a \$10,000 homeowner rehab project and a \$10 million rehab of a multifamily property. The relative financial impact of avoiding an adverse effect is much greater on the single family rehab.
- One of the concerns we hear is that if the owners designate a district, their property values will go up. PlaceEconomics studies often show the same, however, I am curious about whether there is causation between increasing property values and designating a historic district, not just correlation. For instance, if an area is already seeing climbing property values due redevelopment and/or gentrification in the area, that often causes the owners rally together to create an HD to prevent redevelopment in their neighborhood. However, how can we determine if their rising property values are related to their HD status, the ongoing redevelopment in the area, or both? It seems like if cities could create HDs in neighborhoods before redevelopment hits, then there would be greater opportunities to use design guidelines and other regulatory tools to help keep the existing housing stock affordable.

- In most communities, across the years and today, historic preservation, as opposed to HUD, has had a very small impact on affordable housing
- Land costs are what drives prices. Also, global wealth.
- Updating systems in old houses overwhelms many people. Their quick answer is to 'tear it down' and build 'better'. You have barely mentioned that problem here one question about trades and skills.
- Our historic districts have a wider range of house types and sizes than many later districts and they are closer to public transportation making them good locations for affordable housing.

Local Situation

- My answers may be skewed a bit because there is only one historic district in our city and it includes the grandest houses along one major street. These have either been cut up into multifamily, or are still single family but owned by people who can afford a house selling for over \$500,000.
- Our city continues to demo its historic houses; many of the tools are irrelevant here. Huge issue is heir property that deteriorates and can't be sold or rehabilitated. These are great opportunities to rehab for affordable housing but our town tears them down, removing that chance.
- Banks won't lend and insurance companies won't insure for our stock of small shotgun houses. There is 70% ownership in our historically black neighborhood, but title issues preclude most of the help available.
- Need to break it down further between ownership and rental. It's not too hard to find affordable rental housing in historic districts, but prices for the most part are completely out of control. Also, NOLA is unique in that much of the city is blanketed in NR and local districts, so there is a lot of variety in the housing stock.
- Funny you should ask. I live in Asheville and am the board president of the Preservation Society of Asheville & Buncombe County. We are fighting to save 13 historic homes on a traditional corridor that leads to our most historic hotel, The Grove Park Inn. A developer wants to demolish 12 houses to build a 180 unit mixed use project and has committed to 10% affordable units at 80% AMI for an unknown term which has really resonated with our decision making entities. Our group has made strong public arguments for saving these houses and shown how keeping them can address affordable housing, sustain local businesses and be better for the environment. We've even made an offer to purchase the houses that would create permanently affordable units in some of the structures and allow for infill construction but the developers are uninterested. The PZC and City Council seem to have already made up their minds that preservation of these structures is elitist and will gentrify the neighborhood which has historically been work force/middle class. They seem to think the 4,000 signees to our petition are nimby and just can't handle change. Last night, I sat through a 6 hour Planning and Zoning Commission virtual meeting which was chock full of technical difficulties and an obvious predetermination heavily weighted toward support of this project. I'm incredibly frustrated.
- I live in Austin so many of these questions were challenging to answer, as the City does not take seriously the matter of Historic Districts and has a very weak HP department internally. Many of the older neighborhoods that would otherwise be candidates for designation and preservation have already been significantly redeveloped to a point of being unrecognizable. The cobbled together LDC, adopted

back in 1984, makes very little effort to provide incentives for leaving historic-aged housing stock in place and add additional density, mainly in the form of Accessory Dwellings, around them. Additionally, Subchapter F, or what we call the McMansion Ordinance, combined with FAR and impervious cover restrictions in the Zoning code, have had the effect of making redevelopment in lower-income areas more attractive than others, since those area, with smaller houses, represented the easiest path of demolition and rebuilding larger houses to deliver the "highest use" of the land for the developers - hence, hyper gentrification in East Austin and in large swaths of South Austin.

- Preservation does not seem to be addressed much at all in my community. There is a new subdivision currently being developed providing for affordable housing but with increasing lumber costs, who knows how affordable the homes will really be. There certainly are old retail buildings that would benefit from historic preservation grants, incentives etc.
- My city has three local historic districts, 2 national register districts, no design guidelines, and no real penalty for demolishing or severely altering historic properties. As frustrating as that is for me, the single preservationist in town, I find some hope in the possibility that historic properties could be rehabbed and made available as affordable housing. I think this is a natural fit that meets local needs using existing properties while also encouraging preservation and building up, not tearing down my town's historic core.
- Affordable is a relative term. Where I live, in Franklin TN, the median sales price in March was \$719K. The historic district is small & property taxes are low, so those homes are always at a premium. Some of these questions are worded in a way that makes them impossible to answer, such as "Increasing property values causing increasing taxes putting strain on property owners of modest means." That doesn't apply here b/c taxes are already low. Conservative Californians are flooding here like it's the next Gold Rush, buying homes for \$100K over list price. It's insane. Plus most of the gov't thinks home prices are a market issue. They call it attainable housing here, but teachers and police can't afford to live in the towns where they work, whether the house is historic or not.
- As you can see from my answers, I'm well aware of the many tools to support affordable housing through our older housing stock or historic districts. My city, although progressive and preservation minded, has almost none of these tools and has consistently refused to step in and do something, anything, when historic housing is being demolished. We just lost a huge WWII apt complex that was affordable housing for market rate apts. Yes, it was privately owned, but the city could have stepped in. We have a very pro-active historic resources commission as well they can only do so much. I am personally leading the charge in my area on this issue, but even other members of my Board are hesitant to get on board. Yes, I've read all your articles, but I could use more literature and workshops on this to try to educate my city officials.
- In Seattle, several of our historic districts (and all of our residential NR districts) are largely single family. This presents an enormous issue for progressive housing advocates who see swaths of single family as the enemy to affordability. Most of these tools would be great in an idea world, but they would be seen as "keeping the rich richer" in our city. There would be no tears cried for the owners of these houses who can't afford repairs. I asked the city spokeswoman for Seattle's recent HALA program (Housing Affordability and Living) about historic houses (ranging from basic to affluent) and she told me "they should all be razed." There are a handful of us working on a coalition to speak up for preservation

in the city (we have none) because preservation is being steamrolled by political action groups with deep pockets. As a side note, I would LOVE if PE could do a study on Seattle! It's tough here.

- Smaller historic spaces rent for less and cost less to maintain, yet cruddy landlords run these buildings into the ground for profit. Our town ceased to make use of their rental inspection program less than two years after starting it... this was the most effective tool for both preservation and quality housing here. I hear it upset slumlords, found large numbers of illegals, and made City staff deal with more problems than they thought benefits:(
- In my city, preservation is often weaponized by wealthy residents who want to freeze development and keep less well off people out of their neighborhood. LHDs are cumbersome to create with very little city support and are most often created in already wealthy, unaffordable neighborhoods as a tool to combat the development of denser, more affordable multi-family or missing middle housing. In my city, preservation is generally at odds with housing affordability.
- We have lost 1000s of units of housing in our city (Jersey city, nj) by permitting multi unit row houses to convert to single families, which we are actively working on rewriting our LDO to disincentivize. Outside of historic districts, we have density bonuses for variance applications that rehab buildings. I think these items will help, but we are actively seeking to do more

Responsibilities of Historic Preservationists

- What is the point of preserving buildings if not for people to use? If people cannot afford to live in our preserved areas unless they are very rich, then we are failing to preserve the buildings for most people.
- Preservationists should be more concerned about affordable housing. Flex standards, be involved in non-historic older areas to keep people in older houses. These houses may become historic eventually. Become partners with affordable practitioners.
- Portland Oregon has a crisis of homelessness like many other cities. Preservationists and planners should take it as an ethical obligation to save buildings that can provide for houseless people. We are in the business of saving places where people live and work and learn. You cannot keep a building alive by displacing people.
- Preservation needs to be about preserving COMMUNITY character as much as it is about preserving buildings and sites.
- We as a profession need to really up our National "marketing" campaign explaining how preservation is an integral part of the affordable housing solution. Because we're really losing this battle and will only lose more heritage properties and communities as a result.
- Preservationists need to be at the front of this issue keeping older housing stock from being demo'd.
- Much more effort is needed to survey neighborhoods for historic designation or for conservation overlays so that more diverse neighborhoods and neighborhoods of need can access these tools.

- Before coming to this small city. I came from a major very HCOL city. We, as preservationists, gotta be real about historic resources and how important they are. Density is incredibly important to housing crisis and people are getting crushed by landlords and the costs of homeownership. A big part of our jobs should be suggesting good places to add density.
- Historic preservation does not exist in a bubble. It is an integral part to every profession that deals with our built environment, so historic preservation is essential to addressing the affordable housing crisis in places like Miami.
- Preservationists have to fight back on the trope that saving buildings is an elitist activity. We have to actively advocate for good models on incorporating energy savings because most historic buildings should not be excused from doing their part to save the planet. Low-interest and low-income loan programs with preservation standards attached can make it more possible for more buildings to be preserved in a manner that works for both preservationists and the realities of economics.
- Preservationists need to play an active and visible role in preventing gentrification and displacement.
- In Washington, DC, historic preservation is seen as the evil force that is preventing affordable housing for low to moderate income residents. Preservationists here and across the county have to show that historic preservation and affordable housing can and should work together. I believe it is imperative to the success of our field.
- Since much affordable housing stock is in historic neighborhoods (whether formal historic districts or not), this issue is related to historic preservation and preservationists should be involved.
- In Detroit, historic districts are often islands, which can be interpreted as the strength historic districts can have in weathering economic crisis, but it also means there is a sharp divide between those who live in districts and those who live just a block away. General assistance to those who have historic properties would be much more beneficial than incentives to those already in historic districts. Most building stock in the city is historic but not in designated districts. The districts in general aren't the ones who need assistance, but rather those who live in the other neighborhoods and can't afford to invest in their homes. There is also a fundamental philosophical challenge with districts often being single family dwellings with low density which is often the enemy of affordable housing, so on top of addressing financial assistance for those who live in historic houses/neighborhoods outside of districts, we need to have a field-wide conversation about what we mean when we say "preserving the character of a neighborhood" and who that winds up excluding.
- This issue in Philadelphia is critical but there has never been a revolving fund, there were grants long ago for low income homeowners, but the preservation task force has focused on other things as priorities. The preservation task force has been a joke IMHO

Political

• Preservationists need to put the pressure on city governments to prioritize keeping historic districts affordable to the people who have historically lived in them, and to restrict short term rentals and house flippers

- Elected officials have to believe in and understand the benefits of historic preservation. Without their "buy in" it is a very steep uphill battle. One that is frequently lost before you begin.
- preservation tax credits are a great incentive but the attitude of local municipalities is far more important where i live the city is simply unwilling to help people qualify despite the millions in revenue it has received from large commercial tax credit projects
- Local municipalities need better education concerning the value of historic preservation. In my city, if a developer wants to demolish a historic neighborhood or group of homes, they can convince the local planning board and board of adjustment to grant them variances to build multi-family housing as long as there is a tiny set-aside for affordable units. We now have an inclusionary zoning ordinance that requires 10% affordable housing in new construction. Most developers seek greater density than is allowed in order to set aside the 10% and it is always granted, either more height to the building, greater massing, less set-back. Older homes cannot provide the affordability that the developers can so it is easy for the local boards to view them as dispensable. Affordability always trumps preservation.
- Solutions are very "community-dependent." Also, wealthier residents have more means to disseminate misleading information about affordable housing and its occupants. We had a case in the nearby community that was a great use of a historic factory complex. By the time the wealthiest members of the community were finished, you would think that teachers, healthcare employees; young people were all members of a maximum-security prison work release program. It was shameful. To make matters worse, small-minded elected officials feared losing popularity and the prestige of public office over supporting a well-crafted project.

Definitions and Other Issues

- I have an issue with "The scarcity of tradespeople with preservation skills makes historic preservation more expensive." I think this is a misperception. There is a scarcity but the implication is that more tradespeople equates lower cost. A lower cost means tradespeople get paid less via competition. I don't know any tradesperson who is pulling in a six-figure salary. The cost of the work comes from the nature of the work itself, not because tradespeople are charging exorbitant rates from supply-demand issues. If anything, a lack of tradespeople causes delays or makes it cheaper because people go to new construction options instead. These options usually ignore the complexities of actual restoration and are therefore cheaper.
- I'm sure you're aware of this, but there is a terminology minefield in this relationship, as "housing preservation" is a commonly used phrase in affordable housing. But it simply means retention of affordably priced housing it has nothing to do with preservation of buildings. https://nhc.org/policyguide/affordable-rental-housing-preservation-the-basics/
- An issue is always the broad definition of and negative perception of 'affordable.' Do you mean worker housing, poor people housing, entry level homes, or ensuring income diversity in the community? Frankly, affordable is not a descriptor that works in suburban communities, even in those with larger percentages of non-white residents. Preservation needs to move beyond its current constructs to support what makes neighborhoods and their stories important to their residents. Right now, we do a crappy job of understanding that.

- Affordability of housing for sale or rent varies greatly between different districts depending on the existing housing stock and the locations of the different districts. Some of our districts are filled with enormous mansions while others are filled with historic apartment buildings or large single family homes converted into multi-unit use. The latter tend to be some of the most affordable places to rent in the city.
- It's a complicated issue
- Thanks for doing these surveys!
- Is there enough interest in the private side of property management, et al, to support significant amounts of "historic" affordable housing, or will this process always depend on public agencies for day-to-day management (the really hard, long-term effort)?
- As a recent homeowner in a historic neighborhood, I have absolutely no idea what resources are available to me. It would be great to have more advertising of any grants, programs, design guidelines. I am very passionate about preservation, but I bought a house built in 1905 not thinking I would receive any assistance of this type. I don't think the average homeowner knows these programs exist.
- Residents need quality services nearby. Food. Sundries. Recreation. Schools. Churches.

Conclusions

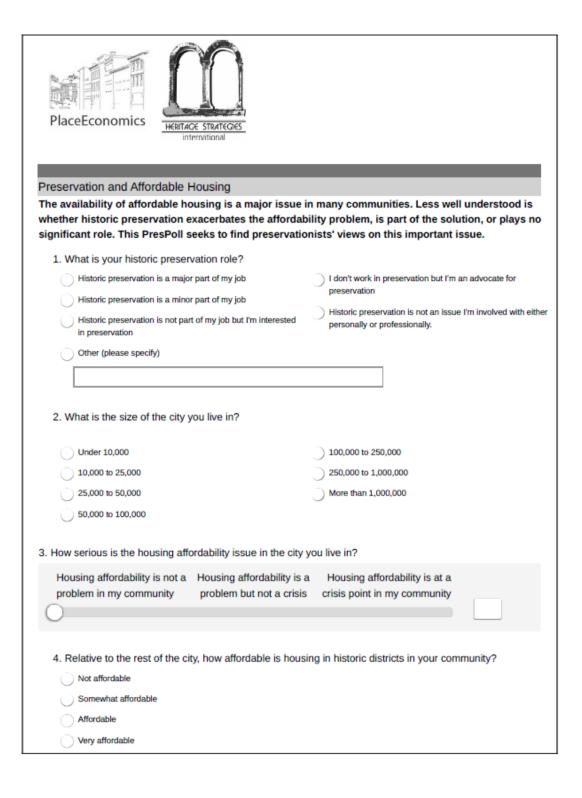
Historic preservation is often blamed for being the cause of the lack of affordable housing. It is not. But what is true is that because of their quality, their character, their location, and their quality-of-life amenities, historic districts are being disproportionately affected by rapidly rising rents and selling prices.

At the same time, great older neighborhoods, not designated as "historic" are simultaneously providing relatively affordable housing and losing those structures to demolition.

Preservationists see the problem, understand its complexity, and want to lead the effort for housing affordability. There are tools that could be effective in that effort, but those tools are not available in most cities.

To address the housing affordability crisis efforts must take place on multiple levels; one of them is historic preservation. Preservationists feel the responsibility to address the issue. They need to be provided the tools to do so.

Appendix 1 – Copy of Survey



commur			
-	affordable		
O Sor	newhat affordable		
O Affe	ordable		
○ Ver	y affordable		

6. How significant are following possible connections between historic preservation and housing affordability as they pertain to your community?				
	This is very true in my community	This is sometimes true in my community	This is largely not the case in my community	
Displacement of long- term residents	•	0	0	
Gentrification in historic districts	0	J	0	
The variety of housing types and sizes in historic districts enhances affordability options	•	0	0	
Increasing property values causing increasing taxes putting strain on property owners of modest means	0	0	0	
Costs of complying with design guidelines too expensive for lower income households	0	•	0	
Design guidelines reduce the threat of demolition of affordable housing stock	0	0	0	
The scarcity of tradespeople with preservation skills makes historic preservation more expensive	•	0	•	
Lack of financial incentives and other tools that make preservation more affordable	Ö	O	0	
Regulatory process too time consuming and cumbersome for working homeowners	0	0	•	

ave in your community?			
	Yes	No	I don't know
Lower tax rate for houses in historic districts	•)	0
Low interest loans for repairs of houses in historic districts	0	Ö	0
Property tax or assessment freeze for several years after improvements are made	•)	•
Grants for repairs	0	\circ	\circ
Different standards for properties in different kinds of districts	0	•	0
Deferred payment loan for structural repairs	0	\circ	0
Much higher demolition fees to discourage razing of existing structures	•	0	•
Rental subsidies	0	0	0
Rent control/Rent stabilization	0	0	•
Land Trusts	0	0	0
Policies encouraging retention of older housing, regardless of whether designated historic or not	•	0	•
Historic preservation revolving fund	0	Ö	0
lease list any tools used for housi	ng affordability in your com	munity not included above	

	Would not be effective	Would be somewhat effective	Would be very effective	I don't know
ower tax rate for ouses in historic istricts	0	0	•	0
ow interest loans for epairs of houses in istoric districts	0	0	0	0
Property tax or assessment freeze for everal years after approvements are made	•	•	0	
Grants for repairs	0	Ö	0	0
oifferent standards for roperties in different ypes of districts	0	0	0	0
Deferred payment loan or structural repairs	0	0	0	0
Much higher demolition ees to discourage azing of existing tructures	0	0	0	0
Rental subsidies	Ö	Ō	Ö	0
Rent control/Rent tabilization	\circ	0	0	0
and Trusts	Ö	0	Ö	\circ
Policies encouraging etention of older cousing, regardless of whether designated istoric or not	٠	0	0	•
distoric preservation evolving fund	0	0	0	0
What role, if any, sh	nould preservationists be	playing in address	sing the issues of affordab	le housing?
Preservationists s	address affor hould but that she		Preservationists should be eading affordable housing efforts	1

10. What additional comments do you have regarding historic preservation and affordable housing?	