

The RKG Study and the Draft Plan, Side by Side

How the City's Workforce Housing Evaluation (RKG Associates, Aug. 31, 2025) maps onto the July 2026 draft of the Housing Action Plan.

Teal = helps the plan · **Gold** = complicates it · **Coral** = undercuts it · **Navy** = supports the permanently affordable housing case

Housing Action Plan element	RKG study element	Effect on the plan
Priority 1: Expand RSA 79-E	Consideration 5 + draft HOZ ordinance	STRENGTHENS 15-yr relief, covenant to 2× — up to 30 years of restriction, ≥1/3 of units ≤80% AMI. Ask: make the 2× covenant the default.
Strengthen workforce housing ordinance	Core finding: bonus-density policy financially infeasible	RETIREES The consultant calls the policy highly unlikely to produce any workforce units. It needs redesign, not tightening.
Priority 5: In-lieu fee	Consideration 4: pro-rata fractional units, value-gap pricing	COMPLETES Supplies the missing terms — what the fee replaces and how it's priced. Adopt by reference.
Housing Trust Fund	Consideration 3: \$22K–\$46K per door; \$3.5M–\$7.5M per project	QUANTIFIES Feasibility priced at 7–15× the fund's ~\$480K balance. Third-party math for the recurring-revenue ask.
Capacity actions (multi-family, height, dimensional)	Consideration 1: by-right density already exceeds developer appetite	CONTRADICTS RKG suggests limiting density; the plan expands it. In the studied zones, feasibility — not capacity — binds. Staff should reconcile on the record.
Affordability depth: 80% vs. 60% AMI	RKG's own caveat: "more units, less depth"	TRADE-OFF The ordinance quietly raises the income ceiling. Chapter 212 allows local tiers — choose openly, don't inherit.
The missing land model	Land-cost inputs: \$25K–\$50K per unit	VALIDATES PP The subsidy gap ≈ the cost of the land. City land under a ground lease closes it permanently, without property-tax subsidy.
The plan's silence on this study	Dated Aug. 31, 2025; first public Sept. 10, 2026	OMISSION A city-commissioned evaluation of the plan's own policy, cited nowhere in the plan. Fair question, asked once.

The bottom line: The City's own consultant confirms the existing incentive is inert, prices the subsidy workforce housing requires, and puts a 30-year covenant on the table — then stops one step short: the gap it measures is roughly the value of the land, which the City can contribute. Sources: RKG Workforce Housing Evaluation (Aug. 31, 2025); Housing Action Plan, July 2026 draft; draft HOZ ordinance (Sept. 10, 2026 packet); HB 1103, Chapter 212, eff. Aug. 31, 2026. Trust Fund balance as reported to Progress Portsmouth; confirm before testimony. Prepared by Progress Portsmouth with AI assistance · progressportsmouth.com