

Category	Current Requirement	Policy Intent	Program Use	Options	Staff Recommendation	Work Group Recommendation
1. Reasonable Equivalency Rental	95% the size of the average units with the same bedroom count as measured in square feet.	City code requires the IH program to have clear and objective administrative criteria that ensure a reasonable equivalency between the IH Units and the market-rate units	Difficult for non-profit owners to be receiving sites	<ol style="list-style-type: none"> 1. Maintain requirement 2. Reduce to original 90%; change to unit type 3. Reduce to 85%; change to unit type 	<p>Reduce to 85%; change to unit type</p> <p>85% matches homeownership option. Streamlines a part of the program. By Unit Type would allow more natural flexibility in floor plans within diminishing reasonable equivalency.</p>	
2. Reasonable Equivalency Rental	<p>No more than 25% of units on any single floor, excluding the top floor.</p> <p>[Receiving Buildings & Consolidated Buildings exempt]</p>	Prevent buildings from creating "poor floor" where all the low-income tenants reside. Designed to limit risk to the project based off instances in other jurisdictions where tenants in low-income units had a separate entrance to the building from the other tenants, colloquially called the "poor door".	Generally, not an issue. Can be an issue when a project has very few ground floor units and those units are all ADA units. If there are less than 4 units on the ground floor, there has been an issue where technically none of the units can be IH.	<ol style="list-style-type: none"> 1. Maintain requirement 2. Increase to 35% 	<p>Increase to 35%</p> <p>Increased allowance provides greater flexibility in building design. Change reflects feedback from work group members.</p> <p>Maintains exemption for Receiving Buildings & Consolidated Buildings</p>	

Off-Site Category	Current Requirement	Policy Intent	Program Use	Options	Staff Recommendation	Work Group Recommendation
3. New Construction Location	New Construction Building must be within one-half mile radius of the Sending Building or in an area with an equal or higher Opportunity Map Score.	Established to avoid developers choosing to site market rate units in high opportunity area and send IH Units into less advantageous area. Based on Opportunity Map analysis including access childhood education, transportation, family wage jobs, healthy food sources, access to natural areas.	<p>Not used often.</p> <p>Difficult for non-profit owners to be receiving sites</p>	<ol style="list-style-type: none"> 1. Maintain requirement 2. Maintain opportunity map score; extend radius requirement to 2 miles 3. Maintain opportunity map score; eliminate the radius requirement 	<p>Maintain opportunity map score, extend radius requirement to 2 miles to read:</p> <p>New Construction Building must be within a two-mile radius of the Sending Building or in an area with an equal or higher Opportunity Map Score.</p>	
4. Existing Building Location	Existing Receiving Building must be within one-half mile radius of the Sending Building or in an area with an equal or higher Opportunity Map Score.	Established to avoid developers choosing to site market rate units in high opportunity area and send IH Units into less advantageous area. Based on Opportunity Map analysis including access childhood education, transportation, family wage jobs, healthy food sources, access to natural areas.	<p>Not used often.</p> <p>Difficult for non-profit owners to be receiving sites</p>	<ol style="list-style-type: none"> 1. Maintain requirement 2. Maintain opportunity map score; extend radius requirement to 2 miles 3. Maintain opportunity map score; eliminate the radius requirement 	<p>Maintain opportunity map score, extend radius requirement to 2 miles to read:</p> <p>Existing Receiving Building must be within a two-mile radius of the Sending Building or in an area with an equal or higher Opportunity Map Score.</p>	

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5. Reconfiguration	<p>Must have at least one Market Rate Unit that has 2+ Bedrooms per reconfigured unit with 3 Bedrooms</p> <p>Must have at least one Market Rate Unit that has 3+ Bedrooms per reconfigured unit with 4 Bedrooms</p>	Directed to implement a policy by City Council to ensure buildings utilizing reconfiguration are not creating family-sized units to only be used by the IH Program, essentially singling out all the families in a building as low-income.	Most buildings in current pipeline would have met these terms	<ol style="list-style-type: none"> 1. Maintain requirement 2. Remove requirement 	<p>Maintain current requirement</p> <p>Removing requirement is not aligned with policy intent.</p>	
6. Reconfiguration	Must be larger than the size of the average square footage of each of the smaller Dwelling Units by Bedroom count.	Directed to implement a policy by City Council to ensure that projects were not creating small family-sized units to reconfigure into while creating larger units with less bedrooms for their market rate units.	Most buildings in current pipeline would have met these terms	<ol style="list-style-type: none"> 1. Maintain requirement 2. Remove requirement 	<p>Maintain current requirement. Removing requirement is not aligned with policy intent. Add language to code section, program guidelines, or as appendix for clarity of implementation:</p> <p>Reconfigured Dwelling Units must be larger than the size of the average square footage of each of the smaller Dwelling Units by Bedroom count.</p> <p>(a) Reconfigured 2BR must be larger than average 1BR Unit Types and average studio units</p> <p>(b) Reconfigured 3BR must be larger than the average 2BR Unit Types, average 1BR Unit Types, and average studio unit types</p> <p>(c) Reconfigured 4BR must be larger than the average 3BR Unit Types, average 2BR Unit Types, the average 1BR Unit Types and the average studio unit types.</p>	
7. Reconfiguration	<p>Reconfigured units must be reasonably equivalent to the size of the average square footage of the one-bedroom Units as follows:</p> <p>(a) 130% for reconfigured 2-Bedroom Units</p> <p>(b) 160% for reconfigured 3-Bedroom Units</p> <p>(c) 190% for reconfigured 4-Bedroom Units</p> <p>If no one-bedroom Units, Reconfigured Units must be reasonably equivalent to the size of the average square footage of the studios as follows:</p> <p>(a) 195% for reconfigured 2-Bedroom Units</p> <p>(b) 240% for reconfigured 3-Bedroom Units</p> <p>(c) 285% for reconfigured 4-Bedroom Units</p>	<p>Originally no requirement to ensure reconfigured units were larger than units with fewer bedrooms.</p> <p>Directed to implement a policy by City Council to ensure reconfigured units were larger than units with fewer bedrooms.</p>	Most buildings in current pipeline would have met these terms	<ol style="list-style-type: none"> 1. Maintain requirement 2. Amend requirement for clarify, ease of implementation, and compliance 3. Explore using a square footage-based model for IH Units 4. Remove requirement 	<p>Amend requirement for clarity</p> <p>If the staff recommendation for item #5 is accepted, then this secondary equivalency standard is unnecessary because policy intent is already captured.</p>	