

Chapter 11

Housing

The Housing Element provides an indication of the need for housing in the community, particularly the availability, affordability, and adequacy of housing. This Housing Element serves as a strategy to address housing needs across the economic and social spectrum of the City of West Hollywood.

STATUTORY REQUIREMENTS

The West Hollywood Housing Element as a mandated chapter of the General Plan has been designed to satisfy the requirements of State law. Section 65583 of the California Government Code establishes the required components for a Housing Element. The Housing Element consists of the following four sections: (1) Statutory Requirements; (2) Context and Strategies; (3) Goals and Policies; and (4) Housing Programs. The Technical Background Report (bound separately) provides a detailed assessment of the City's existing and projected housing needs, constraints and opportunities for addressing those needs, and an evaluation of the City's achievements under the prior 2013-2021 Housing Element.

This sixth cycle of the Housing Element update covers the planning period of October 15, 2021, through October 15, 2029. The Housing Element is designed to achieve the following objectives set forth in State law:

1. Identify adequate sites for a range of housing opportunities;
2. Assist in the development of adequate and affordable housing;
3. Address constraints to meeting the City's housing needs;
4. Conserve and improve the condition of housing; and
5. Affirmatively furthering fair housing for all persons

The "Context and Strategies" summarizes the City's housing needs based on the detailed review of population and housing stock characteristics contained in the Technical Background Report (TBR). The TBR contains specific information on the community's housing needs, constraints to housing development, and resources available for the delivery of housing services and affordable housing. Included in the Technical Background Report is also the City's ability to provide adequate sites to meet its share of the regional housing needs assigned to the City by the Southern California Association of Governments (SCAG).

A key component of the TBR is the summary of the process and results of the City's community outreach program for the Housing Element update. Through various avenues, the City consulted with residents and community stakeholders regarding housing needs and recommendations on housing programs.

The TBR has identified the extent of housing needs and market conditions in the community. As a result, the Housing Implementation Plan sets forth goals and policies to address the identified housing needs and remove/mitigate constraints to the preservation and development of affordable housing. Specific housing programs designed to implement the City's goals and policies are identified in the section entitled "Housing Programs."

Relationship to Other General Plan Elements

According to State planning law, the Housing Element must be consistent with other General Plan elements. While each of the elements are independent, they also are interrelated to some degree. Certain goals and policies of each element may also address issues that are primary subjects of other elements. This integration of issues throughout the General Plan creates a strong basis for the implementation of plans, programs and achievement of community goals. The Housing Element is most closely tied to the Land Use Element as residential development capacities established in the Land Use Element are incorporated into the Housing Element.

This Housing Element builds upon other General Plan elements and is entirely consistent with the policies and goals set forth by the General Plan. When an element in the General Plan is amended, the Housing Element will be reviewed and modified if necessary to ensure continued consistency among the various elements.

CONTEXT AND STRATEGIES

The City of West Hollywood is well recognized as one of the most progressive and inclusive communities in the region. As a leader in many aspects relating to the provision of housing, the City takes pride in its proactive efforts in addressing the needs of all socioeconomic segments of the community.

Changing Housing Needs

West Hollywood is a dynamic community with extensive and changing housing needs. Older adults, persons with disabilities (including those with developmental disabilities), and persons living with HIV/AIDS and other medical conditions continue to represent significant components of the population. However, these residents often have limited incomes which renders them less equipped to compete in the market for decent housing. Providing affordable housing and alternative housing arrangements (e.g., assisted living, residential care, and co-housing, shared homes) for people to age in place and for other persons with special needs to remain in the community is an important goal of the City.

Providing suitable housing for families requires a diversification of the City’s housing stock. Through new construction and adaptive reuse, the City will facilitate a range of housing options to meet the varied needs of all residents.

Aging Housing Stock

Approximately 93 percent of the City’s housing stock is at least 30 years of age, a threshold when housing generally shows signs of aging, requiring major upgrades to the physical structures and systems (such as electrical and plumbing). The median year built of the City’s housing stock is 1962. Many of the City’s rental housing developments have not gone through any major upgrades.

In addition to maintenance and upkeep issues, the City still has a large number of soft-story structures that would present safety concerns in the event of an earthquake.¹ A typical soft-story building in West Hollywood is an apartment building with “tuck-under” parking. Seismic improvements to upgrade these structures can be costly.

In this Housing Element, the City outlines a number of actions toward formulating a comprehensive strategy to address the aging housing stock. The strategy would explore incentives, financial and technical assistance, and monitoring efforts to facilitate rehabilitation of the City’s aging housing stock. In addition, acquisition/rehabilitation of small rental buildings, deteriorating housing, and rental housing at risk of being removed from the rental market under the provisions of the Ellis Act represents a key strategy that works to improving the quality of the housing stock while providing long-term or permanently affordable housing.

- To date, approximately 55% of the property owners of Soft-Weak-Open Face (SWOF) have responded to our Notice to Comply and have submitted screening reports. Retrofit construction drawings continue to come in and some buildings have completed their retrofits.
- Below is an update on seismic retrofit project submittals:

Building Use	City Ordinance	Screening Reports Reviewed	Retrofit Plans Reviewed	Permits Issued	Completed
Residential	SWOF	406	301	163	123
Commercial	NDC	N/A	1	1	1

A major obstacle to implementing this strategy is the lack of funding, time, expense, and relocation of existing occupants of the housing. Therefore, new programs that focus on other incentives to encourage repairs and rehabilitation are included in this Housing Element.

¹ A soft-story building is a multi-story building with openings in places where a shear wall would currently be required for stability as a matter of earthquake engineering design.

Existing Affordable Housing

West Hollywood has extensive needs for affordable housing. Approximately 42 percent of the City's households earn lower incomes. As of 2021, West Hollywood has approximately 16,581 rent stabilized units and 1,056 publicly assisted rental housing units. In addition, 720 households in the City are recipients of Section 8 Housing Choice Vouchers. With rising housing costs in the region, the City must make all feasible efforts to protect its affordable housing stock. Housing options available to the City's workforce, older adults, persons with disabilities, lower income families, and other persons with special needs remain limited. Ownership housing is beyond the reach of most lower and moderate income households in the community.

The City's Inclusionary Housing program plays a key role in creating permanent affordable housing that meets the needs of the community. However, currently all deed restricted affordable units in ownership projects are collectively held by nonprofits and used as affordable rental units. There are no individually owned affordable units created through the City's Inclusionary Housing program.

Goals and Policies

The following provide a framework for the City's goals and policies that create a foundation for all housing actions taken from 2021-2029.

Goal H-1: Provide affordable housing.

Intent: To protect the existing supply of affordable housing and expand affordable housing opportunities.

1. Address the effects of the vacancy de-control regulation (aka Costa-Hawkins) on the rent stabilized housing stock through local measures and legislative efforts.
2. Retain and maintain existing affordable housing, including affordable housing that exists naturally in the market.
3. Work to prevent or minimize displacement of existing residents.
4. Encourage the replacement of multi-family housing that is demolished with housing that is affordable to a wide spectrum of households.
5. Maintain a condominium conversion ordinance aimed at preserving the City's rental housing stock and providing tenant protections for units approved for conversion.
6. Identify and address any unknown factors and forces, including zoning policies, that adversely affect affordability.

Goal H-2: Maintain and enhance the quality of the housing stock and residential neighborhoods.

Intent: To maintain and enhance the quality and integrity of existing residential neighborhoods through programs and incentives to assist in rehabilitation efforts.

1. Assist landlords and other property owners in maintaining and improving their properties through the City's residential rehabilitation programs, State programs (such as the Mills Act), and other innovative mechanisms.
2. Promote strong, on-site management of apartment complexes to ensure the maintenance of housing and neighborhood quality.
3. Encourage development standards that support housing and mixed-use developments while protecting and enhancing the quality of life of residents while being mindful of social inclusion and sustainability goals.
4. Continue to support healthy neighborhoods by addressing public health and safety issues in cooperation with other public agencies and performing ongoing property inspections.

Goal H-3: Encourage a diverse housing stock to address the needs of all socioeconomic segments of the community.

Intent: To provide adequate housing to meet the diverse needs of the community, with due consideration for households with special needs.

1. Facilitate the development of a diverse range of housing options including, but not limited to, single-family homes, accessory dwelling units, multi-family rental housing, condominiums and townhomes, live/work units, housing in mixed use developments, and other flexible housing types (such as co-living, microunits/efficiency units, congregate housing, residential and commercial subdivisions, and permanent supportive housing).
2. Support the development of affordable housing by non-profit organizations through financial assistance and/or regulatory incentives.
3. Continue to implement the Inclusionary Housing Ordinance to ensure that new housing developments expand affordable housing opportunities for lower and moderate income households (including extremely low income households).
4. Promote universal design in the construction of new housing and rehabilitation of existing housing.
5. Facilitate the development of housing with on-site supportive services for older adults, persons with disabilities and other medical conditions, and other persons with special needs.

6. Encourage the development of mixed-income and housing that includes various household compositions to accommodate a range of ages and family types.

Goal H-4: Provide for adequate opportunities for new construction of housing.

Intent: To provide adequate housing sites through appropriate land use and zoning designations to accommodate the City's diverse housing needs.

1. Encourage and provide incentives for the development of housing in mixed use and transit-oriented developments.
2. Provide adequate sites to meet the City's housing needs, including those of special groups, including older adults, persons with disabilities (including developmental disabilities or other medical conditions), people experiencing homelessness, veterans, single parents, and large households.
3. Foster the adaptive reuse of existing structures for residential purposes using construction and planning incentives.
4. Pursuant to State law, prioritize water and sewer services for affordable housing development in the event allocation of services is required.

Goal H-5: Provide for a government environment that facilitates housing development and preservation.

Intent: To mitigate potential governmental constraints to housing development, preservation, and affordability.

1. Provide incentives where feasible to offset or reduce the costs of affordable housing development, including density bonuses and flexibility in site development standards.
2. Periodically review City fees and regulations to ensure that they do not unduly constrain housing development.
3. Consider planning and development fee reductions or relief from development standards for developments that meet the affordable and special housing needs of the community.
4. Provide for timely and coordinated processing of residential and mixed use development projects in order to minimize project holding costs.
5. Streamline the permit processing of 100 percent affordable housing projects and other projects subject to the Housing Accountability Act.

Goal H-6: Affirmatively furthering fair housing for all.

Intent: To promote equal opportunity for all residents to reside in the housing of their choice.

1. Promote equal access to housing opportunities regardless of an individual's special characteristics as protected under State and Federal fair housing laws.
2. Continue to utilize and pursue housing funds, as available and appropriate, to provide housing for special needs groups, including people with disabilities, people with AIDS/HIV, and vulnerable older adults.
3. Support non-profit service providers that help meet the diverse housing and supportive service needs of the community.
4. Assist in settling disputes between tenants and landlords.
5. Explore ways to encourage the development of ownership housing affordable to low and moderate-income households and the City's workforce

HOUSING PROGRAMS

The goals and policies presented above are implemented through a series of housing programs offered primarily through the City's Human Services and Rent Stabilization and Planning and Development Services departments. Housing programs define the specific actions the City will undertake to achieve the stated goals and policies.

Preservation of Existing Housing

1. Retrofitting of Existing Housing

In 2018, the City adopted mandatory ordinances requiring Soft-Weak-Open Faced (SWOF), Non-Ductile Concrete (NDC), and pre-Northridge steel moment frame (PNSMF) buildings (i.e., buildings with seismic support structures that pre-date the 1994 Northridge earthquake) to be evaluated by a structural engineer. If the evaluation found that retrofitting was needed the work will need to be completed in five years for SWOF buildings and 20 years for concrete or steel buildings. In 2018, the City also established a Tenant Habitability Plan requirement for seismic projects to minimize construction impact to in-place tenants during retrofitting. The City's ordinance requires that the City provide Notices to Comply to owners found on our survey list of buildings potentially needed to be strengthened. In 2019, the City sent Notices to all SWOF building property owners notifying them that their buildings needed to begin the process of potentially strengthening their buildings. NDC and PNSMF notifications were put temporarily on hold due to the impact owners incurred due to the COVID pandemic.

Timeframe and Objectives:

- Continue to implement adopted ordinances to facilitate retrofitting of SWOF, NDC, and PNSMF buildings.

Funding Sources: State and federal funds

Responsible Agencies: Human Services and Rent Stabilization/Rent Stabilization and Housing Division; Building and Safety Division

2. Incentives for Rehabilitation

As resources are available, the City shall continue to provide loan assistance to nonprofit affordable housing providers and work with providers to identify new funding sources. The City provides Housing Trust Fund loans to nonprofit housing providers to assist with the purchase and rehabilitation of existing rental properties occupied primarily by low-income households. The acquisition and rehabilitation of existing housing and conversion to affordable rental units preserve naturally occurring affordable housing while also ensuring housing stability for existing tenants by allowing them to remain in their units at deed-restricted affordable rents.

Timeframe and Objectives:

- Explore funding options to incentivize the rehabilitation of aging rent stabilized apartments buildings

Funding Sources: Affordable Housing Trust Fund and potential state and federal funds

Responsible Agencies: Human Services and Rent Stabilization/Rent Stabilization and Housing Division

3. Small Multi-Family Building Acquisition and Rehabilitation

The City is researching the feasibility of creating a local Community Land Trust that could both acquire and rehabilitate existing buildings on behalf of existing low-income tenants (converting Rent Stabilization Ordinance (RSO) buildings to permanent rental housing), convert other buildings to ownership through limited equity co-operatives and other similar mechanisms, and also benefit from the land banking opportunities.

Timeframe and Objectives:

- In 2024, explore the feasibility of establishing a Community Land Trust to facilitate the acquisition/rehabilitation of small RSO buildings and convert these buildings to permanent affordable housing.
- Continue to explore anti-displacement and housing preservation funding as they become available.

Funding Sources: State and federal funds; Affordable Housing Trust Fund

Responsible Agencies: Human Services and Rent Stabilization/Rent Stabilization and Housing Division; Planning and Development Services; Community Services/Property Development

4. Home Secure Program

Offered as a component of the case management services through Jewish Family Services at the West Hollywood Comprehensive Services Center, the Home Secure Program offers free security devices and home protection measures, including door locks, grab bars, peepholes, and smoke detectors, to lower income residents, especially older adults and persons with disabilities.

Timeframe and Objectives:

- Continue to advertise the availability of this program on the City's website and provide brochures at public counters on an ongoing basis.
- Continue to conduct community outreach and make referrals through social services and rent stabilization constituent contacts to enroll older adult and at-risk populations in the Jewish Family Services case management program.
- Assist 200 households over eight years.

Funding Sources: General Fund

Responsible Agencies: Human Services and Rent Stabilization/Social Services Division; Jewish Family Services

5. Historic Preservation

The City of West Hollywood is dedicated to both preservation of historic resources and affordable housing. Overall, 83 multi-family properties in the City are designated as local Cultural Resources. Among these, 46 are subject to the City's Rent Stabilization Ordinance.

Historic properties can be more expensive to repair and maintain, due to the special care in quality of material and details required. To ensure proper rehabilitation and maintenance of these designated properties, it may be necessary to provide incentives to the property owners.

One incentive is the Mills Act. Mills Act contracts are offered to owners of properties, which are designated as Cultural Resources within the City. Under these contracts, the basis for property tax assessments is changed from last sale price to an analysis of the income stream of the property for rental units (or a presumed income stream for owner-occupied units), in recognition of the higher maintenance costs for historic properties. In exchange for lowered property taxes, the property owner agrees to a ten-year maintenance plan for the building. In 2018, the City developed an incentive program for multi-family properties that are designated historic resources. These incentives include:

- Providing technical assistance to property owners and applicants.
- Planning and Building & Safety permit fee waivers related to periodic maintenance including electrical, plumbing, heating/air conditioning work completed every 2-4 years, as well as larger scale repairs including window replacement, re-roofing and system upgrades that occur every 15-20 years.
- An alternative required painting schedule for building interiors and exteriors to reduce the destruction of historic materials.
- Promoting the benefits of the Mills Act program.
- Developing a Historic Apartment Preservation Program that would help rent-stabilized properties not under a Mills Act contract pay for major rehabilitation costs in exchange for a covenant to keep the property rent-stabilized

Timeframe and Objectives:

- Continue to provide technical assistance to owners and applicants regarding the repair and maintenance of historic structures.
- Conduct outreach regarding the benefits of the Mills Act and other incentives for historic multi-family properties through brochures at public counters and social media.
- Continue to develop and implement an inspection schedule for properties under a Mills Act contract.
- Develop and explore funding options to implement a Historic Apartment Preservation Program.

Funding Sources: Departmental budget

Responsible Agencies: Planning and Development Services/Current and Historic Preservation Planning Division

6. Code Compliance

Code compliance is a means to ensure the character and quality of neighborhoods and housing is maintained. The City implements an active code compliance program to identify properties in violation of the City's Property Maintenance Code to work with property owners to rectify substandard conditions. However, many multi-family rental housing properties in the City have not undergone any major systems upgrade, and many substandard conditions, such as aging electrical and plumbing systems, are not visible without in-depth inspections. Moreover, in most cases (smoke/carbon monoxide detectors being a notable exception), the City cannot mandate that property owners upgrade building systems to current standards.

Timeframe and Objectives:

- Continue to implement the Code Compliance program to ensure routine property maintenance and eliminate substandard building conditions.
- Promote incentives available for upgrading to current standards (see Program 2).

Funding Sources: Departmental budget

Responsible Agencies: Department of Public Works

Preservation of Affordability

7. Rent Stabilization Ordinance

The City enacted the Rent Stabilization Ordinance in June 1985 to maintain the affordability of rental housing in West Hollywood. The Ordinance regulates residential rent levels, requires that rental units meet specific maintenance standards, and protects tenants from eviction except in specified circumstances. Under the Ordinance, the Maximum Allowable Rent (MAR), the most a landlord could charge, is the initial rent charged for the tenancy plus any intervening general adjustments allowed by the City that the landlord charged to the tenant.

In 1995 the Costa-Hawkins Rental Housing Act was passed to enforce gradual Statewide de-control of rent-controlled housing as vacancy occurs. Full implementation of Costa-Hawkins began in 1999.

Timeframe and Objectives:

- Continue to maintain a Rent Stabilization program, and work towards alleviating the effects of State mandated vacancy decontrol through legislative action and local incentives to maintain affordable rents.
- Continue to implement the Aging in Place/Aging in Community Strategic Plan that uses a multidisciplinary approach to aging in place through the lens of West Hollywood, where many older adults are long-term renters in rent stabilized units.

- Continue to conduct workshops to educate landlords and tenants on matters related to the Rent Stabilization Ordinance, including topics such as property maintenance, housing services, registration, mediation, and evictions.

Funding Sources: Departmental budget

Responsible Agencies: Human Services and Rent Stabilization/Rent Stabilization & Housing Division; Social Services Division and Strategic Initiatives Division

8. Housing Choice Vouchers

The Housing Choice Vouchers (HCV) is designed to assist extremely low and very low-income households in making their monthly rental payments by providing a rent subsidy directly to the participating property owner in the private sector. The objective of the program is to provide the means for decent, safe, sanitary rental housing for families who might not otherwise be able to afford this type of housing. The Los Angeles County Housing Authority administers the Housing Choice Voucher program. As of 2021, 720 households in West Hollywood were receiving Housing Choice Vouchers. The vast majority of these recipients were older adults and/or persons with disabilities. Based on HUD regulations, 70 percent of the new voucher recipients must be extremely low-income households.

Timeframe and Objectives:

- Include information in semi-annual mailings to property owners outlining the State's new source of income protection (SB 329 and SB 222) that requires landlords to recognize public assistance (including HCV) as a legitimate source of income for rent payments.
- Undertake proactive measures to ensure the continued availability and usefulness of HCV for extremely low and very low-income West Hollywood residents. Specifically, work with the Los Angeles County Housing Authority to maintain and increase the payment standards for vouchers to reflect the actual cost of renting in Los Angeles County.

Funding Sources: HUD funds

Responsible Agencies: Housing Authority of the County of Los Angeles

9. Preservation of Publicly Assisted Housing

In addition to the City's rent stabilized housing stock, the City has an inventory of affordable housing that is assisted with local, state, and federal housing funds. There are 1,056 publicly assisted units in multi-family developments in West Hollywood. While 800 Kings Road has a potentially expiring Section 8 contract, it is owned by the Los Angeles County Community Development Authority (LACDA) and is therefore not considered at risk of converting the 106 units in the building to market-rate housing. Most other projects are deed-restricted as affordable housing in perpetuity. Nonetheless, the City will continue to monitor projects for any change in circumstance.

Timeframe and Objectives:

- Continue to maintain close contact with the property owners regarding their long-term plan for the projects.
- Pursue State and federal funding programs to assist in the improvement of affordable housing projects.

Funding Sources: Affordable Housing Trust Fund; State and federal funds

Responsible Agencies: Human Services and Rent Stabilization/Rent Stabilization and Housing Division

10. Residential Referral List

As an attractive, diverse urban community, West Hollywood has a tight rental market, with very low vacancies and high rent levels. To assist with those seeking rental units in West Hollywood, the City publishes and updates a weekly list of residential units available for rent. The list is compiled based on information provided by local landlords and apartment management companies. The list is available online and emailed to persons registered to receive the updates.

Timeframe and Objectives:

- Continue to make available and update weekly the residential referral list of rental units. Expand the referral list to include accessibility as part of the listed amenities to assist persons with disabilities in identifying suitable units.
- Continue to encourage landlords to participate in this program to expand access to prospective tenants.
- Educate participating landlords on opportunities for guaranteed rent by engaging community partners that assist at-risk residents.

Funding Sources: Departmental budget

Responsible Agencies: Human Services and Rent Stabilization/Rent Stabilization and Housing Division

Production of Housing

11. Adequate Sites for RHNA and Monitoring of No Net Loss

For the sixth cycle Housing Element update, the City has been allocated a Regional Housing Needs Assessment (RHNA) of 3,933 units:

- Very Low Income: 1,066 units (27.1 percent)
- Low Income: 689 units (17.5 percent)
- Moderate Income: 682 units (17.4 percent)
- Above Moderate Income: 1,496 units (38.0 percent)

Through projected Accessory Dwelling Units and entitled/pipeline projects, the City has already met 917 units of its RHNA. Available vacant/nonvacant sites primarily in the City's Mixed Use Incentive Overlay and other zones that permit residential uses are adequate to fully accommodate the remaining RHNA of 3,016 units. To ensure that the City monitor its compliance with SB 166 (No Net Loss), the City will develop a procedure to track:

- Unit count and income/affordability assumed on parcels included in the sites inventory.
- Actual units constructed and income/affordability when parcels are developed.
- Net change in capacity and summary of remaining capacity in meeting remaining Regional Housing Needs Allocation (RHNA).

Timeframe and Objectives:

- Ensure that adequate capacity exists to accommodate the City's RHNA of 3,933 housing units
- Continue to Encourage mixed-use development at key nodes along commercial boulevards.
- Develop a procedure in 2022 to monitor the development of vacant and nonvacant sites in the sites inventory and ensure that adequate sites are available to meet the remaining RHNA by income category.
- In 2022, evaluate the City's existing development incentive/bonus programs, such as the mixed use incentive, to assess their efficacy in realizing the quantity and types of most needed housing and potential relationship with any new incentives.
- In 2022, consider expanding the Mixed Use Incentive Overlay.
- In 2022, consider expanding the Avenues Bonus program (for Melrose and Beverly), which offers FAR bonus for mixed use projects, to all design districts.
- Commit to the production of affordable housing on city-owned properties identified in the residential sites inventory for potential housing development.

- In 2023, consider permitting density and height increases in the TOZ.
- In 2022, consider streamlining 100 percent affordable housing projects and projects subject to the Housing Accountability Act.
- In 2023, consider streamlining development standards for the conversion of office space into housing.
- In 2022, consider amending residential zone density to realign with requirements from County of Los Angeles prior to cityhood.

Funding Sources: Departmental budget

Responsible Agencies: Planning and Development Services/Long Range Planning Division; Community Services/Property Development

12. Replacement Housing

Development on nonvacant RHNA sites with existing residential units is subject to replacement requirement pursuant to AB 1397. As such, the City will amend the Zoning Ordinance to require that any existing units be replaced with units affordable to the same or lower income level. This requirement will be a condition of approval for any development on a nonvacant RHNA site consistent with those requirements set forth in State Density Bonus Law.

Timeframe and Objectives:

- Amend the Zoning Ordinance in 2022 to address the replacement requirement pursuant to AB 1397.

Funding Sources: Departmental budget

Responsible Agencies: Planning and Development Services/Long Range Planning Division

13. Accessory Dwelling Units

Accessory Dwelling Unit (ADU) represents an important affordable housing option to lower and moderate income households. The State has passed multiple bills in recent years to minimize constraints to the development ADUs (including AB 587, AB 671, AB 68, and SB 13, among others). The City updated its ADU provisions in 2020 to comply with all State regulations pertaining to ADU development.

As part of an effort to explore potential programs to increase housing affordability in West Hollywood, the City has developed an Affordable ADU Pilot Program. The pilot program would provide a 10-year forgivable loan in exchange for renting the unit to an eligible tenant earning

no more than 50 percent AMI (very low income). The City Council has also directed City staff to clarify and streamline ADU services in order to encourage ADU production and analyze other potential zoning constraints to ADU development such as height, setback, and floor area.

Timeframe and Objectives:

- Continue to implement the Affordable ADU Pilot Program with the goal of achieving three affordable ADUs.
- In 2022, pursue funding for an expanded program after the Pilot Program.
- In 2022, develop incentives to facilitate ADU construction. Incentives may include waiver or reduction of fees, pre-approved site and floor plans, and expedited review.
- Continue to monitor the trend of ADU development to identify other potential constraints and revise the ADU ordinance as necessary and appropriate by 2023. Amendment to the ADU ordinance may include allowing ADU to be sold separately under specific circumstances.

Funding Sources: Departmental budget

Responsible Agencies: Human Services and Rent Stabilization/Rent Stabilization and Housing Division; Planning and Development Services/Long Range Planning Division; Community Services/Property Development

14. Inclusionary Housing Ordinance

The Inclusionary Housing Ordinance requires residential developers to set aside a portion of units in each new housing development for lower and moderate-income households. This set-aside is 20 percent for projects with over ten units and one unit for projects with ten or fewer units. For projects with ten or fewer units, however, the City allows the option of paying an in-lieu fee that is deposited into the City's Affordable Housing Trust Fund. In addition, under certain circumstances, projects of any size can apply to provide inclusionary units off site.

To encourage the construction of affordable housing, the City provides developers who include inclusionary units in their projects with density bonuses generally consistent with the State density bonus law. In addition to the standard bonus (per State density bonus law), bonuses can allow density increases up to 100 percent above the maximum density permitted by the underlying zone, if certain provisions are met. The Inclusionary Housing Ordinance also provides the following regulatory incentives: reduced requirements in the form of "concessions" or modifications to development standards (height, setbacks, open space), and permit lower minimum parking requirements. With the recent changes to the State Density Bonus law, the Inclusionary Housing Ordinance will be reviewed for full conformance with the State requirements.

Timeframe and Objectives:

- In 2022, review and revise as appropriate the Inclusionary Housing Ordinance to ensure compliance with the State Density Bonus law.
- Annually monitor market conditions and development trends to ensure that the Ordinance works effectively to provide affordable housing in the community but does not unduly constrain housing development in general. If constraints are identified, the City will make necessary improvements to the ordinance to enhance its effectiveness in facilitating the development of housing for all income groups.
- Continue to prioritize inclusionary housing units for tenants displaced due to Ellis Act and consider developing a programmatic approach within the Inclusionary Housing Ordinance to assist persons with disabilities (including persons with developmental disabilities) and those aging in place.

Funding Sources: Departmental budget

Responsible Agencies: Planning and Development Services/Long Range Planning Division; Human Services and Rent Stabilization/Rent Stabilization and Housing Division; Community Services/Property Development

15. Affordable Housing Development through Partnerships with Non-Profits

West Hollywood Community Housing Corporation (WHCHC) plays a major role in providing affordable housing in West Hollywood. Established in 1986, the WHCHC was formed to build, rehabilitate, and manage affordable housing developments for lower income and special needs households in the City. WHCHC leverages local funds provided through the Affordable Housing Trust Fund (AHTF) with other outside funding, such as Low-Income Housing Tax Credits (LIHTC) to provide units that are deeply subsidized.

In addition to WHCHC, the City has worked with other non-profits including EAH Housing, LA Housing Partnership, Menorah Housing, Alternative Living for the Aging and is interested in continuing to support other qualified non-profits in the provision of affordable housing.

Timeframe and Objectives:

- Continue to support WHCHC and other non-profit organizations in the development of affordable and special needs housing through the provision of financial and regulatory incentives with the goal of creating 500 affordable units.
- In 2021, utilize the Urban Land Institute (ULI) Technical Assistance Panels (TAP) to conduct a highest-and-best use analysis on the six City-owned properties, including affordable housing on four of the six sites listed in the residential sites inventory.

Funding Sources: Affordable Housing Trust Fund; LIHTC

Responsible Agencies: Human Services and Rent Stabilization/Rent Stabilization and Housing Division; West Hollywood Community Housing Corporation; Community Services/Property Development

16. Community Land Trust

A Community Land Trust (CLT) is a nonprofit, community-based organization designed to ensure community stewardship of land held for affordable housing purposes. Specifically, CLT is a mechanism for creating affordable homeownership units and maintaining the units as affordable over the long-term.

Timeframe and Objectives:

- In 2023, explore the feasibility of establishing a Community Land Trust that can be used for various affordable housing activities, such as acquisition and rehabilitation of small rental buildings, and development of affordable ownership housing.

Funding Sources: Affordable Housing Trust Fund; State Housing Trust Fund

Responsible Agencies: Human Services and Rent Stabilization/Rent Stabilization and Housing Division; Community Services/Property Development

17. Workforce Housing, Missing Middle, Family Housing, and Ownership Housing Opportunities

The City provides affordable rental housing for lower and moderate income households through its Rent Stabilization Ordinance; Inclusionary Housing Ordinance; partnership with nonprofits to develop, acquire, and rehabilitate affordable housing; and Housing Choice Vouchers. Homeownership remains out of reach for most of the City's lower and moderate-income households. Specifically, affordable units created in for-sale housing projects through the City's Inclusionary Housing Ordinance have all been collectively owned by nonprofits and used as affordable rental units. The City has no individually owned affordable housing units. Housing options for young families and the City's workforce are limited in the community.

Residents of West Hollywood can access homebuyer assistance programs offered by LACDA and the State. These include:

- **Home Ownership Program (HOP):** HOP is financed with HOME funds provided through HUD. Designed to meet the needs of low-income families, HOP provides loans of up to 20 percent of the purchase price for down payment and closing costs assistance not to exceed \$75,000. Each loan is a second Trust Deed loan provided at zero interest with all

payments deferred until sale, transfer, refinancing, no longer owner-occupied, or full repayment of the first mortgage. HOP loans are available to first-time homebuyers in the unincorporated areas of Los Angeles County and cities participating in the Community Development Block Grant (CDBG) Urban County Program.

- **Mortgage Credit Certificates (MCC):** The MCC Program offers the first-time homebuyer a federal income tax credit. This tax credit reduces the federal taxes the holder of the certificate pays. It can also help the first-time homebuyer qualify for a loan by allowing a lender to reduce the housing expense ratio by tax savings. The qualified homebuyer who is awarded an MCC may take an annual credit against their federal income taxes paid on the homebuyer's mortgage. The credit is subtracted dollar-for-dollar from his or her federal income taxes. The qualified buyer is awarded a tax credit of up to 15 percent with the remaining 85 percent taken as a deduction from the income in the usual manner.
- **First Home Mortgage Program:** Southern California Home Financing Authority (SCHFA) is a joint powers authority between Los Angeles and Orange Counties formed in June 1988 to create first-time homebuyer programs for low- to moderate-income households. The program is administered by the Los Angeles County Development Authority (LACDA) and the Public Finance Division of the County of Orange. SCHFA does not lend money directly to homebuyers. Homebuyers must work directly with a participating lender.

However, the high prices of for-sale homes in the City render the limited use of these programs.

Timeframe and Objectives:

- Explore creative housing types such as accessory dwelling units, co-living housing, micro/efficiency units, residential and commercial subdivisions and other flexible housing types to increase opportunities for affordable homeownership.
- Promote homebuyer assistance programs on City website, newsletter, and other social media platforms.
- In 2022 and as funding is needed in the future, pursue CalHome grants to provide homebuyer assistance.
- In 2024, consider the addition of another affordable category with a variety of incentives to establish new middle income/workforce housing.

Funding Sources: Departmental budget

Responsible Agencies: Planning and Development Services/Long Range Planning Division; Human Services and Rent Stabilization/Rent Stabilization and Housing Division; Community Services/Property Development

18. Commercial Development Impact Fee

In conjunction with the Inclusionary Housing Ordinance, the City has established a Commercial Development Impact Fee to mitigate the impact of new commercial development on the need for affordable housing and generate additional revenues for affordable housing activities. Under this program, new commercial developments in West Hollywood are required to provide housing affordable to employees or pay an in-lieu impact fee, which is placed in the Affordable Housing Trust Fund to be used for a variety of housing activities, including rehabilitation and new construction.

Timeframe and Objectives:

- Annually monitor market conditions and development trends regularly to ensure that the Commercial Impact Fee works effectively to provide affordable housing in the community but does not unduly constrain development in general.

Funding Sources: Departmental budget

Responsible Agencies: Planning and Development Services/Long Range Planning Division

19. Green Building

West Hollywood adopted one of the nation's first mandatory Green Building Ordinance and it became effective on October 1, 2007. The City updated this groundbreaking ordinance in 2019 in order to stay current with industry best practices. The ordinance ensures that new buildings will be healthier for residents and use energy and resources more efficiently. Flexibility, responsiveness to local conditions, and cost-effectiveness are key features of the ordinance. The City has created a Green Building Manual to help guide developers through the process.

The Green Building Ordinance and Manual was updated in 2019 to keep pace with progressive national sustainable building design standards, the State's Green Building Standards Code (CALGreen), and ever-evolving local and regional industry trends. The "green" development standards are green building requirements for remodels, tenant improvements, additions, and new construction. These updated standards were incorporated into both the Municipal Code (to modify State requirements for electric vehicle charging readiness, water fixtures and fittings specifications, outdoor water submetering, and local requirements for public green buildings) and the Zoning Ordinance (to update and reinforce other environmental measures such as rooftop solar, vegetative roof, stormwater management, transportation demand management, bicycle requirements, and waste collection & diversion).

The updated Green Building Requirements includes:

- Mandatory green building standards for all applicable project types

- Additional high-achieving threshold requirements for projects seeking approval of specific plans or development agreements
- Streamlined project application submittal requirements that align with and complement State green building requirements

The Green Building Program positions the City as a steward in promoting the optimal health of the environment and community, in striving for energy efficiency and clean energy, and in fostering environmentally responsive development for all occupants.

Timeframe and Objectives:

- Continue to implement the Green Building program that offers incentives and flexibility for compliance and update as needed.
- Promote green building standards in the City’s affordable housing stock by providing financial assistance for improvements.

Funding Sources: Departmental budget

Responsible Agencies: Planning and Development Services/Long Range Planning Division and Building and Safety Division

Removal of Governmental Constraints

20. Residential Development Standards and Process

The City will conduct a study of multi-family development standards in order to expand opportunities for additional housing. Strategies may include, but are not limited to:

- Consider amending density standards to allow more units to be constructed
- Establish objective design standards
- Replace second floor setback requirements with incentives for Climate Action achievement
- Allow individual metering for water and energy consumption.
- Change/reduce/eliminate certain parking requirements, allow for shared parking and unbundling of parking to allow parking to be sold separately, and evaluate potential modifications to parking size standards
- Incentivize public space on private property to allow more livability
- Revise threshold for Planning Commission review to reduce time delay and uncertainty for housing development projects.

Similarly, the City will evaluate its single-family residential development standards to increase the number of homes in single-family residential neighborhoods.

Timeframe and Objectives:

- In 2022, continue the study of single-family and multi-family housing development standards and amend Zoning Ordinance as appropriate to facilitate needed residential and mixed use development, including revising the threshold for Planning Commission review.

Funding Sources: Departmental budget

Responsible Agencies: Planning and Development Services/Long Range Planning Division

21. Zoning Ordinance Amendments

Recent changes to State law regarding the State density bonus and housing for community members who are currently experiencing homelessness and persons with special needs warrant amendments to the Zoning Ordinance. These include:

- **Low Barrier Navigation Centers (AB 101):** AB 101 requires cities to allow a Low Barrier Navigation Center development by right (ministerial, without discretionary review) in areas zoned for mixed uses and nonresidential zones permitting multifamily uses if it meets specified requirements. A “Low Barrier Navigation Center” is defined as “a Housing First, low-barrier, service-enriched shelter focused on moving people into permanent housing that provides temporary living facilities while case managers connect individuals experiencing homelessness to income, public benefits, health services, shelter, and housing.” Low Barrier shelters may include options such as allowing pets, permitting partners to share living space, and providing storage for residents’ possessions.
- **Emergency and Transitional Housing (AB 139 and SB 2):** Local governments may include parking requirements for emergency shelters specifying that adequate parking must be provided for shelter staff, but overall parking requirements for shelters may not exceed the requirements for residential and commercial uses in the same zone.

In addition, the City’s Emergency Shelter Overlay pursuant to SB 2 (2007) includes a separation requirement of a minimum of 300 feet between two shelters. However, State law permits a maximum separation of 300 feet.

- **Supportive Housing (AB 2162):** AB 2162 requires supportive housing projects of 50 units or fewer to be permitted by right (or ministerial, without discretionary review) in zones where multi-family and mixed-use developments are permitted, when the development meets certain conditions. The bill also prohibits minimum parking requirements for supportive housing within ½ mile of a public transit stop. The Zoning Ordinance defines transitional and supportive housing in accordance with State law and allows them subject to the restrictions that apply to other residential dwellings of the same type in the same zone.

- **Density Bonus (AB 2345):** AB 2345 increases the maximum available density bonus for projects not comprised exclusively of affordable units from 35 percent to 50 percent. The City will review and update as necessary the Inclusionary Housing Ordinance to ensure compliance with State Density Bonus provisions.

Timeframe and Objectives:

- By the end of 2022, amend Zoning Ordinance to address AB 101, AB 139, AB 2162, and AB 2345 requirements.

Funding Sources: Departmental budget

Responsible Agencies: Planning and Development Services/Long Range Planning Division

22. Streamlined Processing

Residential development in West Hollywood requires permits and/or approvals from various City departments, such as a permit from Rent Stabilization and Housing Division to remove units from the rental market, and Planning Division approval of a development permit and/or subdivision map. The City requires Planning Commission review of multi-family projects with seven or more units in the R3 zoning district, and for projects with 11 or more units in R4 zoning districts. In order to streamline processing of housing projects, all residential projects in the R1 and R2 zoning districts, and all projects below the unit count thresholds stated above in the R3 and R4 zoning districts can be approved without a public hearing.

Timeframe and Objectives:

- In 2022, develop written procedures for processing projects eligible for streamlined review and approval under SB 35, as required by State law.
- Continue to work on improving the streamlined processing procedures, including increasing threshold of unit numbers for Planning Commission review and removing Planning Commission review when projects utilize the density bonus.
- Streamline development review process and develop objective standards for 100% affordable housing projects.
- Consistent with the Housing Crisis Act (SB 330), the City utilizes the State’s standard preliminary application checklist to facilitate project review.

Funding Sources: Departmental budget

Responsible Agencies: Planning and Development Services/Current and Historic Preservation Planning Division

23. Fee Waivers for Affordable Housing

The City levies various impact fees on new developments to address deficiencies in community amenities, such as parks, transit-related facilities, and art. To ensure that impact fees do not constrain affordable housing development, the City exempts non-profit-sponsored affordable housing projects from art, park and transportation fees, and residential developments with more than 25 percent affordable housing units from park, and transportation fees (per Section 19.64.030(a) of the Zoning Ordinance). In addition, the City Council has adopted a policy waiving all City-imposed plan check and other fees for nonprofit-sponsored projects that are 100 percent affordable.

Timeframe and Objectives:

- Continue to waive certain fees for residential projects with 25 percent or more affordable units.
- Continue to waive all City-imposed plan check and other fees for non-profit-sponsored projects are 100 percent affordable.

Funding Sources: Departmental budget

Responsible Agencies: Planning and Development Services/Current and Historic Preservation Planning Division

Affirmatively Furthering Fair Housing

24. Fair Housing Outreach and Enforcement

As a participating jurisdiction in the Los Angeles County CDBG program, fair housing services are coordinated by the Los Angeles County Development Authority on behalf of the City. The County contracts with the Housing Rights Center, a non-profit organization, to identify, mediate, investigate, and if necessary, prosecute landlords and property owners in violation of fair housing laws. The Housing Rights Center also provides information to the public about housing discrimination and landlord/tenant rights and responsibilities.

Timeframe and Objectives:

- Continue to provide multi-lingual fair housing information to the public regularly as needed via the public counters, message boards, City website, and neighborhood watch, and in response to telephone inquiries.
- Continue to provide referral to the Housing Rights Center, State Fair Employment and Housing, HUD Fair Housing and Equal Opportunity division, and other legal services as appropriate.
- Continue to pursue legal action when necessary on behalf of tenants.

Funding Sources:

County CDBG; Departmental budget

Responsible Agencies:

Human Services and Rent Stabilization/ Rent Stabilization and Housing Division; Administrative Services/Legal Services Division and Dispute Resolution Services; City Attorney's Office; Housing Rights Center

25. Tenant/Landlord Mediation

Mediation is an informal and voluntary way of resolving disputes between tenants and landlords. The City offers a mediation program as an alternative means to settle disputes regarding maintenance, housing services, and other tenant/landlord issues. Mediation is free, voluntary, and informal. Mediation is conducted in a neutral setting. The mediator is an impartial third party who serves to facilitate the discussion and focus on all the issues. The tenant and landlord have the opportunity to communicate openly and directly with each other to arrive at a mutually satisfactory agreement.

Timeframe and Objectives:

- Continue to offer the mediation program and promote the program through information on City website, program brochures at public counters, social media, and other innovative communication tools.

Funding Sources:

Departmental budget

Responsible Agencies:

Human Services & Rent Stabilization/Rent Stabilization Division

26. Tenant Eviction Protection

The City's Rent Stabilization Ordinance limits the grounds on which a tenant may be evicted to the following: nonpayment of rent; creating a nuisance or using a rental unit for illegal purposes; subleasing without a landlord's permission; failure to provide the landlord with

reasonable access; violating the rental agreement; and failure to renew a rental agreement. Tenants may also be evicted when the owner seeks to withdraw the entire property from the rental housing market pursuant to the Ellis Act. Certain of these evictions entitle the tenant to receive relocation assistance from the tenant's landlord.

Timeframe and Objectives:

- Continue to prevent unlawful eviction and fund legal aid organizations that provide tenant education and representation regarding landlord/tenant disputes.
- Renew contracts with mediation service providers annually.
- Annually review current laws and recommend any needed modifications to ensure protection of tenants to the maximum extent legally possible.
- Continue to monitor and investigate allegations of tenant harassment.

Funding Sources: Departmental budget

Responsible Agencies: Human Services and Rent Stabilization/Rent Stabilization and Housing Division; Social Services Division

27. Services for Special Needs Populations

The City contracts with various non-profit services providers that help meet the supportive services needs of West Hollywood residents, including lower income households, older adults, people with disabilities (including persons with developmental disabilities), persons with HIV/AIDS, people experiencing homelessness, and veterans. Major non-profit service providers active in West Hollywood include Affordable Living for the Aging, Menorah Housing, Being Alive, Alliance for Housing and Healing, Disability Community Resource Center, Step Up on Second, Ascencia, Jewish Family Services and Los Angeles LGBT Center. Services currently offered through these organizations include case management, roommate referrals, senior nutrition sites, home improvement assistance, health center, in-home supportive services, peer counseling, short-term financial assistance for rent and utilities, and legal services. The City Council also appoints community stakeholders to the Senior Advisory Board and Disabilities Advisory Board to address the needs of these populations.

To assist in meeting the special housing needs of people experiencing homelessness, the Social Services Divisions administers contracts with agencies that provide outreach and supportive services to help people get housed. These agencies include Step Up, LA LGBT Center, Ascencia, APLA, Tarzana Treatment Centers and more. Services range from shelter/bridge housing, peer support, mental health counseling, medical services, substance use disorder treatment, and housing retention services. These agencies make referrals to other West Hollywood contracted agencies for services ranging from food and nutrition to case management, counseling, job training, career readiness and socialization programs. When community members call City Hall

requesting help or support, Social Services Division staff provide appropriate referrals to the network of contracted agencies.

The Social Services Division publishes on-line a social services directory to provide the community with detailed information on assistance or services available, including food and shelter, AIDS education, pre-school, job placement, legal services, mental health services, and homeless services. These services are provided by contracts with local non-profit agencies and by in-house programs. The directory can also be obtained by contacting the Human Services Department.

Timeframe and Objectives:

- Continue to contract with and financially support non-profit services providers that help meet the supportive services needs of West Hollywood’s diverse community, especially those with extremely low incomes.
- Annually update the social services directory, and make it available to residents at public counters and on City website.
- Beginning in 2021, explore the feasibility of establishing a Guaranteed Income program, which as funding permits, would provide supplemental income to qualified households in the City.
- Beginning in 2021, identify a space to locate a day center facility within the City of West Hollywood
- Beginning in 2021, explore possible locations for a temporary bridge housing facility to provide accommodations for individuals who are actively engaged in services leading to permanent housing.
- Beginning in 2021, explore opportunities for the City to support the purchase and conversion of motels into supportive housing.

Funding Sources: CDBG; Departmental budget

Responsible Agencies: Strategic Initiatives Division; Social Services Division

28. Enhanced Management

The Enhanced Management Program is administered by WHCHC at all of its projects, which include 429 units in West Hollywood. This program combines standard property management practices with referral to community service agencies, information about supportive services and community building activities. At each WHCHC development, a Resident Services Coordinator is available and responsible for maintaining contact with residents and monitoring their need for social services.

Timeframe and Objectives:

- Continue to coordinate with WHCHC to continue the Enhanced Management Program at all current and future housing projects.
- Encourage other nonprofit housing providers to follow the WHCHC model.

Funding Sources: Departmental budget

Responsible Agencies: Human Services and Rent Stabilization/Rent Stabilization and Housing Division.

29. Business Assistance and Relocation Support

Redevelopment of nonvacant sites with existing nonresidential uses may result in displacing of existing businesses in the community. The City will explore programs and assistance that would help stabilize the business neighborhoods and provide relocation support.

Timeframe and Objectives:

- In 2023, work with experienced developers, commercial real estate brokers, and the business community to the displacement of existing businesses during redevelopment of underutilized properties.

Funding Sources: Departmental budget

Responsible Agencies: Business Development

30. Community Engagement

The City values community input and strives to engage in outreach to all segments of the community. The City will engage the community on an ongoing basis regarding housing policy issues. Mechanisms may include:

- Newsletters and interactive information, such as InfoMap on City website and other communication tools.
- Informational and educational series on housing-related topics.
- Technical Assistance Panels of professionals to give feedback to the City on land use and design issues related to the development regulations and improvement of housing.
- Dedicate city webpages to housing-related resources to homeowners and landlords, including incentives and programs offered by local utility companies on sustainable improvements, and financial assistance for utility payments.

Timeframe and Objectives:

- In 2022, design and initiate an annual community engagement program that affords increased efforts to underserved groups.

Funding Sources: Departmental budget

Responsible Agencies: City Manager's Office; Human Services and Rent Stabilization/Rent Stabilization and Housing Division; Planning and Development Services/Long Range Planning Division

31. Housing-Related Urban Programming – Wellness + Walkability

The City values promoting the optimal health of the environment and community, and supports conserving and developing appropriate housing in the City and providing services and amenities to support a walkable, accessible community for all residents.

Timeframe and Objectives:

- Production of new housing that is focused on greatest needs (income, special needs, lifestyle preferences, etc.) and is sustainable, innovative, safe and resilient, appropriate with the surrounding neighborhood, offers opportunities for active and healthy living, including walking and biking, and increases equitable housing opportunities.
- Adequate Land for Housing. Provide adequately zoned sites particularly multi-unit housing in infill areas or commercial corridors in closer proximity to major transportation hubs for diverse housing types that include both rental and ownership opportunities.
- Health and Wellness. Promote integrated site development with housing that either includes on-site programming or is within walking distance of essential goods and services in order to reduce pollution and promote healthy, active living in areas that have historically excluded diverse housing opportunities.
- Complete Economies. Adopt new standards over the next two years that encourage mixed-use developments to support a vibrant local economy and incorporate smaller commercial components, non-profit spaces, or gap businesses defined as those which provide essential goods or services that are missing from the area of the city where the development is proposed.
- Sustainable and Healthy Communities. The City shall ensure that local regulations for objective design standards, which will be considered within the next two years, support sustainable and environmentally responsive construction to the extent technically feasible, environmental justice that protects public health, increased open space, and restorative tree canopy and green space efforts designed to foster a healthy eco-system and local micro-climate.

Funding Sources: Departmental budget

Responsible Agencies: Community Services/Urban Design and Architecture Studio;
Planning and Development Services/Long Range Planning Division

Summary of Quantified Objectives

The following table summarizes the City's quantified objectives for the period of 2021 through 2029.

	Extremely Low	Very Low	Low	Moderate	Above Moderate	Total
Units to be Constructed		200	300	500	1,000	2,000
Units to be Rehabilitated						
Units to be Preserved (All Affordable Units)	264	264	528	--	--	1,056