



**STAFF REPORT
CITY OF BEVERLY HILLS**

**For the Planning Commission
Meeting of June 24, 2010**

TO: The Planning Commission
FROM: Peter Noonan, AICP, Associate Planner
THROUGH: Jonathan Lait, AICP, City Planner
SUBJECT: **Housing Element** – Discussion and direction to staff regarding Draft Programs of the update to the City's Housing Element.

EXECUTIVE SUMMARY

This study session continues the Housing Element update discussion began on April 22, and continued on May 13, 2010. At this study session, the Planning Commission will review a portion of the draft housing programs, and provide revisions and direction to include the programs in the draft document to be sent to the State's Department of Housing and Community Development (HCD) in August.

This report transmits part one of the draft housing programs. These programs are part of the 5-year strategy to plan for the creation of affordable housing. On July 15, part two of the draft housing programs will be presented. This review will include the remaining 5-year strategy draft programs and the potential housing sites inventory.

DISCUSSION

At the May 13 study session, the Planning Commission reviewed and revised the housing goals and policies. Those goals and policies have been provided in Attachment A. As in the other General Plan elements, implementation programs associated with each policy have been included in parenthesis at the end. Some policies do not have implementation programs associated with them. These programs will be discussed on July 15.

The draft housing programs referenced at the end of policies (in parentheses) in Attachment A are provided in Attachment B. The programs have been numbered sequentially to follow after the last of the General Plan implementation programs. There are eight implementation programs in the General Plan, and therefore, the housing programs begin at number 9.0.

The focus of this study session is to review these programs. The study session will be set up with the draft programs on the viewing screens to allow the Planning Commission to discuss, and make any necessary changes in session.

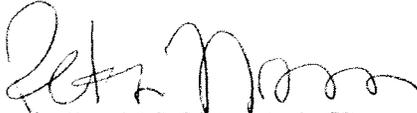
NEXT STEPS

The next study session, planned for July 15, will focus on reviewing the potential sites inventory, and considering programs that would revise the City's current multi-family residential development standards. Revisions to the development standards may be necessary in order to accommodate the number of affordable housing units which the City is required by the State to plan for.

Once all of the housing programs have been reviewed, the complete draft Housing Element update document will be brought to the following meeting on July 29 for a recommendation to send to HCD for their initial review.

RECOMMENDATION

Consider the draft programs attached, revise as appropriate, and recommend that the programs be included in the draft Housing Element update document.



PETER NOONAN, AICP

Attachments:

Attachment A – Housing Goals and Policies – with draft Programs Referenced

Attachment B – Draft Programs

City of Beverly Hills
 DRAFT HOUSING GOALS AND POLICIES
 with Programs Identified
 Revisions From Discussion on May 13, 2010

DRAFT 2008 – 2014 GOALS AND POLICIES

Conserve and Improve Existing Housing Stock

- | | |
|------|---|
| H1 | Maintenance and Conservation. Maintain and enhance the quality and character of existing housing and residential neighborhoods. |
| H1.1 | Neighborhood Character. Maintain the character and quality of residential neighborhoods. (Imp. 9.1, 9.2) |
| H1.2 | Healthy and Safe Housing. Support healthy neighborhoods by addressing public health and safety issues, performing property inspections, and eliminating threats to public health. (Imp. 9.3) |
| H1.3 | Home Repair Assistance. Provide assistance to low- and moderate-income households to encourage the adequate maintenance and rehabilitation of existing housing, such as through the Handy-worker program. (Imp. 9.4) |
| H1.4 | Historic Preservation. Promote the preservation of historically and architecturally significant buildings and the quality of historic neighborhoods through land use, design and housing policies. |
| H1.5 | Conservation of Existing Rental Housing. Regulate the conversion of rental apartments to condominium ownership. (Imp. 9.5) |
| H1.6 | Rent Stabilization. Continue to provide tenant protections through the City's Rent Stabilization Ordinance. (Imp. 9.6) |
| H1.7 | Preservation of Affordable Housing. Support preservation of publicly subsidized rental housing to maintain affordability to lower income households. (Imp. 9.7) |

City of Beverly Hills
 DRAFT HOUSING GOALS AND POLICIES
 with Programs Identified
 Revisions From Discussion on May 13, 2010

<i>Provide New Housing Opportunities</i>	
H2	Housing Supply and Diversity. Provide a variety of housing types and adequate affordable housing supply to meet the existing and future needs of the community.
H2.1	Affordable Housing Incentives. Offer incentives, including density bonuses, where feasible to offset or reduce the costs of developing affordable housing. Proactively seek out new approaches in the provision of affordable housing.
H2.2	Inclusionary Housing. Pursue adoption of an inclusionary housing program to integrate affordable units within market rate developments, and increase the availability of affordable housing throughout the community.
H2.3	Housing Trust Fund. Create a Housing Trust Fund to financially assist nonprofit and for-profit developers in the creation of affordable housing. (Imp. 10.3)
H2.4	Second Units. Promote second units as a means of providing lower cost housing options for seniors, caretakers, and others.
H2.5	Adaptive Reuse. Support innovative strategies for the adaptive reuse of residential and commercial structures to provide for a wide range of housing types.
H2.6	Site Information. Provide information to residential developers regarding sites that may be suitable for new affordable housing development. (Imp. 10.5)
H2.7	Environmentally Sustainable Housing. Promote conservation of water and energy, use of sustainable building materials and drought-resistant landscaping to reduce the operating costs and carbon emissions associated with housing. (Imp. 10.6)
H2.8	Transit-Oriented Housing. Promote access, where feasible, from residential neighborhoods and new residential development to existing transit stops and to the anticipated subway stations.

City of Beverly Hills
DRAFT HOUSING GOALS AND POLICIES
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H2.9	<p>Jobs/ Housing Balance. Promote programs seeking to provide housing opportunities for people who work in the City as a means of reducing long commutes, easing local traffic, improving air quality and helping to achieve a balanced regional jobs/housing distribution for the western portion of Los Angeles County. (Imp. 10.7, 10.8)</p>
H2.10	<p>Workforce Housing. Study and develop programs to increase the amount of rental and ownership housing affordable to the local workforce. (Imp. 10.8)</p>
H2.11	<p>Partnerships for Affordable Housing. Explore opportunities for partnerships with adjacent jurisdictions and other governmental agencies in the provision of housing. Collaborate with non-profit organizations to provide greater access to affordable housing funds. (Imp. 10.8)</p>
<p><i>Promote Equal Housing Opportunities and Special Needs Housing</i></p>	
H3	<p>Fair Housing and Special Needs Residents. Promote equal housing opportunities for all residents; including Beverly Hills' special needs populations, so residents have a choice of appropriate housing.</p>
H3.1	<p>Fair Housing Practices. Promote fair housing and non-discrimination in the sale and rental of housing by coordinating with organizations that provide information, counseling and mediation on fair housing laws and landlord-tenant disputes. (Imp. 11.1)</p>
H3.2	<p>Senior Housing. Support the provision of a variety of housing options for seniors to foster independence and the ability of seniors to remain in the community as they age. (Imp. 11.2)</p>
H3.3	<p>Senior Support Services. Continue to offer housing support services for seniors, including case management and homeshare programs. (Imp. 11.2, 11.3)</p>
H3.4	<p>Housing Accessibility. Address the special housing needs of persons with disabilities through adoption of reasonable accommodation procedures, homeowners assistance grants, and supportive housing. (Imp 11.4)</p>
H3.5	<p>Homeless Programs. Continue to provide support to community service organizations that assist the homeless through provision of housing and services. (Imp. 11.5)</p>

City of Beverly Hills
DRAFT HOUSING GOALS AND POLICIES
 with Programs Identified
 Revisions From Discussion on May 13, 2010

<i>Remove Governmental Constraints</i>	
H4	Constraints. Mitigate potential governmental constraints on the maintenance, improvement and development of housing, while maintaining community character.
H4.1	Zone for a Variety of Housing Types. Amend the Zoning Ordinance, as required by State law, to facilitate the provision of a variety of housing types for special needs populations, including persons with disabilities, the homeless, and persons at risk of homelessness.
H4.2	Adjust Development Standards. Evaluate and modify development standards as appropriate to better facilitate the provision of affordable housing.
H 4.3	Fee Reduction. Establish a process to provide fee waivers to facilitate the production of affordable, senior, and workforce housing. (Imp 12.3)

DRAFT HOUSING PROGRAMS, PART 1

9.0 Conserve and Improve Existing Housing Stock

Number	Program Name	Status
Imp 9.1	Upkeep and maintenance of vacated buildings (Was Policy 1.4)	Existing
<p>The City requires the exterior of vacated multi-family structures that will be demolished for redevelopment to be adequately maintained as a condition of tentative map approvals, and extensions.</p> <p>The City's Code Enforcement Office (Community Preservation) maintains a list of all vacant properties in the City, monitors the sites, and works with the property owners to assure that the properties are maintained in an appropriate manner.</p> <p><u>Timeline:</u> Ongoing</p> <p><u>Funding Source:</u> Department Budget</p> <p><u>Responsible City Section:</u> Community Development Department</p>		
Imp 9.2	Property Maintenance	Existing
<p>The City requires housing to be maintained in an aesthetic, safe and habitable manner consistent with City codes. The program is run as part of the City's comprehensive Code Enforcement program (Community Preservation) and is structured as a re-active, complaint-driven inspection process.</p> <p><u>Timeline:</u> On-going</p> <p><u>Funding Source:</u> Department Budget</p> <p><u>Responsible City Section:</u> Community Development Department</p>		
Imp 9.3	Annual Rental Housing Inspections (Was Policy 1.5)	New
<p>As a means of becoming more proactive in ensuring the continued quality of multi-family housing, the City is developing a housing inspection program funded by a per unit assessment to participating properties. As a part of developing this program, the City will consider adopting standards for habitability and building safety that are more stringent than State requirements. Standards for aesthetic condition and routine building maintenance will also be considered.</p> <p><u>Timeline:</u> Develop program parameters in 2012, with implementation by 2013</p> <p><u>Funding Source:</u> Per unit cost assessed on rental properties</p> <p><u>Responsible City Section:</u> Community Development Department</p>		
Imp 9.4	Home Repair and Improvement	Existing
<p>The Handyworker Program provides minor home repair, and improved security and mobility assistance to low income tenants and homeowners in single and multi-family units. The program is administered by Jewish Family Services at no cost to the qualifying low-income owner, or tenant. Jewish Family Services provides community outreach, applicant screening, pre-construction site visits, repairs and remodeling, and confirmation that the property meets the</p>		

Number	Program Name	Status
	<p>City's standards for habitability.</p> <p><u>Population Served</u>: Very-Low and Low- income (up to 80% AMI) households</p> <p><u>Eligible Repairs</u>: Interior/ Exterior Repairs, Energy Conservation Activities, Security/ Safety Improvements</p> <p><u>Managed By</u>: Jewish Family Services</p> <p><u>Maximum Award Amount</u>: \$2,000 grant (one project per year) Award amount may increase up to \$5,000 if additional repairs are required to meet the City's standards for habitability.</p> <p><u>Target</u>: Serve 40 low income households per year.</p> <p><u>Timeline</u>: On-going</p> <p><u>Funding Source</u>: CDBG</p> <p><u>Responsible City Section</u>: City Manager's Office</p>	
Imp 9.5	Condominium Conversions	Modified
	<p>This program limits loss of rental housing units due to the conversion of existing apartment buildings to condominiums by setting an annual cap and providing protections for tenants.</p> <p>Currently, apartment buildings proposed for conversion to condominium ownership are subject to the City's condominium conversion regulations (Beverly Hills Municipal Code Sections 10-2-710, 711, and 712). These regulations set forth a series of tenant protections including tenant noticing, relocation provisions, right of first purchase, and extended lease provisions for senior and disabled households. These regulations also set an annual limit on the number of conversions allowed.</p> <p>The City will evaluate success of the existing ordinance, and consider modifying it to require a number of units in any building converted to be set aside as affordable rental or ownership housing. The City will also evaluate the benefit of offering an in-lieu fee option that would go into the Housing Trust Fund and be used to provide affordable housing elsewhere in the City.</p> <p><u>Timeline</u>: Evaluate ordinance revisions to address affordability in 2011, and, as appropriate, amend the ordinance in 2012.</p> <p><u>Funding Source</u>: Departmental Budget</p> <p><u>Responsible City Section</u>: Community Development Department</p>	
Imp 9.6	Rent Stabilization	Existing
	<p>Continue the City's rent stabilization ordinance to investigate tenant complaints regarding unlawful rent increases, service reductions, evictions and relocations.</p> <p>The Community Preservation Office administers the rent stabilization program which affects approximately 12,800 apartment units in the City. The ordinance limits annual rent increases to no more than ten percent and provides tenant protections through required noticing of rent increases and evictions. Community Preservation officers respond to approximately 480 inquires from residents annually, with approximately 30 complaints requiring follow-up investigation. Most complaints are resolved within 45 days with the remainder being referred to "stepped up enforcement action", including but not limited to citations and further legal action.</p> <p><u>Timeline</u>: On-going</p>	

Number	Program Name	Status
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Funding Source: Departmental Budget
Responsible City Section: Community Preservation
Target: Investigate 30 complaints per year.

Imp 9.7	Monitoring Affordable Housing	Existing
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The City of Beverly Hills currently has one assisted housing project providing 150 units of affordable rental housing to very low income seniors. This project was originally financed under the HUD Section 202 program with project-based Section 8 certificates providing ongoing affordability. Although this project is not currently at-risk of conversion to market rate housing, the City will continue to coordinate with service provider to monitor Section 8 renewals, advise tenants in advance of any potential conversion dates, and provide opportunities to continue affordability covenants.

Number of Units: 150
Number of Affordable Units: 150 (Very Low Income, Senior/ Disabled)
Year Built: 1988
Affordability Covenant: 40 years
Owner/Operator: Menorah Housing Foundation
Timeline: On-going
Funding Source: Departmental Budget
Responsible City Section: Human Services Division, Community Services Department

10.0 *Provide New Housing Opportunities*

Number	Program Name	Status
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Imp 10.3	Housing Trust Fund	New
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Because the City does not have a Redevelopment Agency and has limited access to state and federal housing resources, the City of Beverly Hills faces financial constraints in its ability to facilitate the construction of affordable housing. To create a more viable funding source, the City will establish a Housing Trust Fund that will be used to construct or help leverage construction for the city's seniors and workforce. Potential Trust Fund resources include development agreements, in-lieu fees from an Inclusionary Housing Program, and/or the creation of a Commercial Linkage Fee. An Affordable Housing Program will be established to manage the Trust Fund and establish parameters for allocation of funds towards projects. Since January 1, 2006, the City has entered into three development agreements that included funds allocated for the Housing Trust Fund. To date, none of these projects has submitted for building permits, and therefore, the funds have not been collected. This program moves forward with the formal establishment of a housing trust fund, identifying optimal funding sources and proceeding with the collection of fees.

Timeline:
Funding Sources: Inclusionary Housing In-lieu Fees, Commercial Linkage Fees, Development Agreements
Responsible City Section: City Manager's Office

Number	Program Name	Status
Imp 10.5	Affordable Housing Brochure and Outreach	New
<p>The City will develop a brochure to summarize available incentives offered for the development of affordable housing including fee waivers, density bonuses and inclusionary housing requirements. The brochure will also summarize development standards for all multi-family residential areas in the City. A series of web page and downloadable handouts will be made available on the City's website, in the permit center, and in other public information areas. As an initial step, all materials will be mailed to major for-profit and nonprofit housing and mixed-use developers, and informational materials directing the development community to the webpage will be broadly distributed to increase awareness.</p>		
<p><u>Timeline:</u> Develop and disseminate outreach materials in 2012.</p>		
<p><u>Funding Sources:</u> Departmental Budget</p>		
<p><u>Responsible City Sections:</u> Community Development Department</p>		
Imp 10.6	Sustainability and Green Building	New
<p>"Green buildings" are structures that are designed, renovated, re-used or operated in a manner that enhances resource efficiency and sustainability. These structures reduce water consumption, improve energy efficiency and lessen a building's overall environmental impact. The City of Beverly Hills adopted a local green building program in 2008, establishing requirements similar to the green building measures under the US Green Building Council's LEED Program (Leadership in Energy & Environmental Design). The program applies to all new multi-family, mixed-use and commercial buildings, and renovations of multi-family, mixed-use and commercial buildings totaling over 50% in cost of the building's valuation. If compliance with the program would frustrate the ability to provide affordable housing in a project, some or all of the program can be waived.</p>		
<p>Beverly Hills has also adopted a Sustainability Master Plan in conjunction with recent amendments to its General Plan. The overall goal of the Sustainable City Plan is to reduce the City's carbon footprint by providing a model framework for sustainable practices for the environment, the economy and social equity.</p>		
<p><u>Timeline:</u> Ongoing.</p>		
<p><u>Funding Sources:</u> Departmental Budget</p>		
<p><u>Responsible City Sections:</u> Community Development, Public Works Departments</p>		
Imp 10.7	Commercial Development Linkage Fee	New
<p>High housing costs on the Westside of Los Angeles, and Beverly Hills in particular, results in a majority of the workforce unable to live near where they work, contributing to traffic congestion, air pollution and greenhouse gas emissions. Many California jurisdictions facing similar jobs/housing imbalance challenges have adopted commercial development linkage fee programs. Such programs – also known as jobs-housing linkage fees - are impact fees that local governments place on new industrial, commercial and office developments to offset the impact that new employment has on housing needs within a community.</p>		
<p>The initial step in developing a linkage fee is to undertake a nexus study to quantify the specific housing impacts generated by different types of commercial and industrial development, and</p>		

Number	Program Name	Status
<p>to then translate these impacts into an associated fee amount. The City of Beverly Hills will undertake a commercial/housing linkage nexus study, and based on the study's findings, adopt a commercial impact fee program. Revenues generated from the program will be contributed to the City's Housing Trust Fund for expenditure on housing for the community's workforce.</p> <p><u>Timeline:</u> Conduct commercial/housing linkage nexus study in 2012, followed by a commercial linkage ordinance and fee in 2013.</p> <p><u>Funding Source:</u> Development Projects</p> <p><u>Responsible City Section:</u> Community Development Department, City Manager's Office</p>		

Imp 10.8 Partnerships with Affordable Housing Developers New

In today's housing market, creative approaches are required to finance and build affordable and special needs housing. Beverly Hills successfully partnered with the non-profit Menorah Housing Foundation to achieve development of 150 units of affordable senior housing, and has contracted with Alternative Living for the Aging for implementation of the senior shared housing program in the past. Both of these organizations own and manage numerous affordable housing developments for seniors in greater Los Angeles and can serve as potential resources for future senior housing in Beverly Hills. Several other local non-profits specialize in affordable workforce and family housing – such as West Hollywood Housing Corporation, Jamboree Housing and National Community Renaissance.

Providing adequate and affordable housing for senior residents and the local workforce is an important goal for Beverly Hills. In addition to developing and disseminating an affordable housing brochure (refer to Program 10.5), the City will conduct a developer's workshop to provide outreach to affordable housing developers. The purpose of the workshop will be to inform the development community of prospective sites for housing, development incentives, and available financial assistance to support the development of affordable workforce and senior housing.

Timeline: Conduct developer's workshop in 2011.

Funding Source: Departmental Budget

Responsible City Section:

11.0 Promote Equal Housing Opportunities and Special Needs Housing

Number	Program Name	Status
Imp 11.1	Fair Housing Program	Existing
<p>As a participating jurisdiction in the Los Angeles County CDBG program, fair housing services are coordinated by the County Community Development Commission on behalf of the City. The County currently contracts with the Housing Rights Center (HRC) to serve as the provider of fair housing and tenant-landlord information for its participating jurisdictions, including Beverly Hills. HRC provides fair housing investigation and coordinates referral services to assist individuals who may have been the victims of discrimination. Many of the people who contact HRC have basic questions about landlord and tenant rights and responsibilities; HRC's housing counselors provide clients with comprehensive information to help resolve tenant/landlord issues.</p>		
<p>The City will continue to promote fair housing practices, and refer fair housing complaints to</p>		

Number	Program Name	Status
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Housing Rights Center. As a means of furthering fair housing education and outreach in the local community, the City will advertise the fair housing program through placement of fair housing services brochures at public counters in City Hall and the library, at the Beverly Hills Senior Center, and on the City's website.

Timeline: Initiate advertising in 2011.

Funding Source:

Responsible City Section:

Imp 11.2	Senior Case Management Program	Existing
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The City contracts with Jewish Family Services to provide a comprehensive case management program to assist frail elderly residents to remain independent and in their homes.

The following continuum of supportive services are provided to seniors who are frail, economically needy, and/or socially isolated:

- Comprehensive assessment – In-home psycho-social assessment of functional abilities, health status, mental and cognitive abilities, support network, financial health, safety risks, eligibility for government benefits and other programs. The comprehensive assessment includes:
 - Development of an individual care plan – Identifies senior's needs and associated services that will allow continued independence.
 - Service coordination – Coordination with appropriate services, including in-home care-workers, ERS, home delivered meals, assistance to obtain governmental benefits, arranging for other community based services, transportation assistance, and coordination of services with medical providers, family, and social supports.
 - Emergency Response Systems (ERS) – ERS are medical devices placed in a senior's home and connected to a central emergency location.
 - Monitoring/ home visits: Social workers make regularly scheduled home visits to assure quality of services, and that changing needs are met.
- Additional Services: Information, referral and crisis intervention, consultation and advocacy, and assistance to families to further support the senior's independent living.

Approximately 20 Beverly Hills seniors are served annually under the comprehensive case management program. In addition, Jewish Family Services provides broad case management services through the Beverly Hills Senior Center, including information, referral and crisis intervention, serving approximately 200 seniors per year.

Timeline: On-going

Funding Source: CDBG, City of Beverly Hills Community Assistance Fund

Responsible City Section: City Manager's Office

Number	Program Name	Status
Imp 11.3	Senior Homesharing Program	Existing
<p>The City has participated with Alternative Living for the Aging (ALA) in the past to provide a free shared housing program to its residents. The program matches older people with others (younger and older) interested in sharing their homes. Housing counselors at ALA interview each potential roommate and obtain references, leaving the decision to the potential roommates whether to make a match. Sharing a home promotes independent living, provides additional income for the provider, an affordable rent for the seeker, and the potential for deeper relationships for both. The average age of community members in Beverly Hills is growing older, and over 750 seniors currently live alone in single-family homes in the City. Shared housing promotes efficient use of housing stock, and can help address the housing needs of seniors.</p> <p><u>Timeline:</u></p> <p><u>Funding Source:</u></p> <p><u>Responsible City Section:</u></p>		
Imp 11.4	Accessible Housing	New
<p>Pursuant to Senate Bill 520, jurisdictions are required to analyze constraints to the development, maintenance, and improvement of housing for persons with disabilities and take measures to remove constraints. As part of this Housing Element, Beverly Hills has conducted a review of zoning, building codes, and permit processing procedures and while the City has not identified any institutional barriers to the provisions of accessible housing, the City does not have in place specific procedures for requesting a reasonable accommodation. As a means of facilitating such requests and removing constraints for persons with disabilities, the City will develop and adopt written procedures for reasonable accommodation requests with respect to zoning laws, permit processing, and building laws. Procedures will specify who may request an accommodation, time frame for decision-making, and modification provisions. Inform, and educate the public on the process of requesting an accommodation.</p> <p>Timeline: By 2011, develop and adopt specific written procedures for reasonable accommodation requests.</p> <p><u>Responsible City Section:</u> Community Development Department</p>		
Imp 11.5	Funding for Homeless Services	Existing
<p>The City provides funds to the Changing Lives and Sharing Places (CLASP) Homeless Outreach and Engagement Program. The program currently has 46 homeless people in the City on its active case management list. CLASP connects homeless persons with services and shelter. Shelter is offered through People Assisting The Homeless (PATH).</p> <p><u>Service Provider:</u> Step Up on Second</p> <p><u>Annual Award:</u> \$85,000</p> <p><u>Timeline:</u> On-going</p> <p><u>Funding Source:</u> Departmental Budget</p> <p><u>Responsible City Section:</u> Human Services Division, Community Services Department</p>		

12.0 Remove Governmental Constraints

Number	Program Name	Status
Imp 12.3	Reduced Fees for Affordable Housing	New
<p>Beverly Hills collects various fees from development to cover the costs of processing permits and providing services and facilities. The City will evaluate the economic benefit of providing waivers or reductions of certain fees for developments containing very low, low- and moderate-income housing units, including the Park and Recreation tax and the Dwelling Unit tax.</p> <p>The California legislature passed AB 611 in 2007 which helps to address the cash flow problems inherent in many affordable housing projects during the construction phase. For affordable housing developments in which at least 49 percent of the units are affordable to lower income households, AB 641 prohibits local governments from requiring the payment of local developer fees prior to receiving a certificate of occupancy.</p> <p><u>Timeline:</u> Conduct fee study in 2012, and adopt modified development fees for affordable housing as appropriate.</p> <p><u>Funding Source:</u> Departmental Budget</p> <p><u>Responsible City Section:</u> Community Development Department</p>		

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