Dear Chairs and Land Use Commissioners,

Summarized below please find recommendations pertaining to Draft 3's affordability

provisions. Details are contained in the attached document. Please note that these issues were

not addressed in the recently released Staff Addendum and Errata.

**1. Simplify proposed density bonus programs and raise affordable unit set-asides**

**to a minimum of 5%.**

**2. Amend Downtown Density Bonus MFI levels to match other density bonus**

**programs at 60% MFI for rental units and 80% MFI for ownership units.**

**3. Consider deeper affordability in exchange for fewer units.**

**4. Raise proposed citywide fixed rate commercial fee-in-lieu or provide simple**

**calibrations for market conditions based on location.**

**5. For all density bonus programs, base the percentage of affordable units on the**

**total number of units in project per existing VMU, not just the bonus units as**

**proposed.**

**6. Strengthen monitoring requirements for density bonus units.**

**7. Close loophole that allows “floating” affordable units.**

**8. Ensure new by-right entitlements elsewhere in the code are factored into**

**affordable housing pro formas.**

**9. Clarify Draft definition of “affordable housing” by replacing or augmenting**

**with the phrase: “See Article 23-3E: Affordable Housing.”**

**10. Replace “High Opportunity Area” with “Qualifying Area” and strengthen**

**definition to require that at least three criteria must be met.**

**11. Clarify reference to Affordable Housing Criteria Manual and provide link.**

**12. Clearly define Designated Review Group.**

**13. Strengthen language for waiving transit-oriented requirements.**

**14. Amend to ensure City Council’s authority to balance competing needs for**

**ordinances that may impact affordability and development**

**fees.**

As always, thank you for your patience, consideration and hard work on behalf of our

community.

Best,

Susan Moffat

Former CodeNEXT Advisory Group Member