May 21, 2018

**SUBJECT**
Inclusionary Housing Ordinance Requiring Affordable Units in Residential Developments (new Article 29 of the Zoning Ordinance), Moving Affordable Housing Impact Fee Regulations from the Municipal Code to New Zoning Ordinance Article 29, and Related Updates to State Density Bonus Law Provisions (Section 32.19) and Adopting an Affordable Housing In-Lieu Fee

**RECOMMENDATION**
1) Hold a public hearing,
2) Introduce an Ordinance Amending the Zoning Ordinance and Municipal Code,
3) Adopt a Resolution Creating a New Affordable Housing In-Lieu Fee,
4) Find that the proposed Ordinance and In-Lieu Fee Resolution Are Exempt From CEQA Under CEQA Guidelines Section 15061(B)(3), and
5) By Motion, Direct Staff to Report Back to the Planning Commission and City Council in Three Years

**BACKGROUND**
In 2013, the City adopted a housing element with a variety of policies and programs intended to increase housing supply and address housing affordability issues. The Regional Housing Needs Allocation (RHNA) goal, a critical component of the Housing Element, is a primary consideration when establishing housing policies. The RHNA goal identifies the amount of housing at each affordability level needed to meet projected local demand.¹

Recent Redwood City multi-family residential developments have primarily contained market rate units. Previously, the Redevelopment Agency had required 15% of all units to be affordable, resulting in the production of over 700 affordable units. In 2015, to

¹ The RHNA is a state-mandated process used to identify the total number of housing units that each jurisdiction must accommodate in Housing Elements. As part of this process, the California Department of Housing and Community Development (HCD) identifies the total housing need for the Bay Area. The Association of Bay Area Governments (ABAG), as the Regional Planning Agency, develops the methodology to distribute the housing need to local governments consistent with the region’s Sustainable Communities Strategy.
address the loss of Redevelopment Agency affordable housing funds and increase the production of affordable housing, the City adopted affordable housing impact fees for both residential and non-residential development. The collected fees are deposited into the Affordable Housing Fund and are used towards construction of new affordable housing, acquisition of land, or conversion of existing units to low or very low-income units. The fee program was designed to meet the requirements of a 2009 court decision, Palmer/Sixth Street Properties, L.P. v. City of Los Angeles ("Palmer"), which stated that requiring on-site construction of affordable rental units was a violation of State Law, specifically the Costa-Hawkins Rental Housing Act. Cities were prohibited from requiring inclusionary housing for rental projects.

In September of 2017, Governor Brown signed into law a package of housing bills intended to address housing issues and the public review process throughout the State. Two of the bills are related to the City’s efforts to encourage affordable unit production. AB 1505 supersedes the Palmer case and allows cities and counties to require on-site construction of affordable rental housing (also called “inclusionary” housing). In other words, a City may now require that a certain percentage of units in each new housing development be designated as affordable. In December of 2017, the City Council initiated proceedings to consider an inclusionary housing requirement.

SB 35 provides an affordable housing streamlined review and decision process in jurisdictions that have not issued enough building permits by income category within a defined reporting period to satisfy the RHNA requirements. Eligibility for streamlining under SB 35 is based upon the number of above-moderate and/or low-income units produced within the reporting period. In the most recent reporting period, Redwood City met the RHNA goal for above-moderate (or market-rate) unit production. As a result, streamlining would apply for residential projects that contains at least 50% of the units affordable to low-income households.

The City currently has several development-related policies and programs relating to affordable housing:

1. An affordable housing impact fee for new residential, commercial and office development. This impact fee program allows developers to build on-site affordable housing in-lieu of the fee, if the developer chooses to do so.
2. A Downtown Precise Plan requirement that 15% (375 units) of the total 2,500 new residential units be developed for low or very low income households
3. A requirement in the North Main Street Precise Plan that 15% of new market-rate residential units be provided for very low, low or moderate-income households. The 353 Main Street project meets this requirement by providing 19 very low, low and moderate income units.
4. Financial support of a wide variety of affordable housing projects, including property acquisition to create or preserve affordability, home improvement loan programs, homelessness programs and home sharing support through the Community Development Block Grant and HOME Investment Partnerships programs. In particular, this program supported the 707 Bradford project of 117 very low income units and the 612 Jefferson project of 20 low income ownership units by Habitat for Humanity.

**PROJECT DESCRIPTION**

In order to strengthen the City’s existing housing policies and programs, City staff is proposing an inclusionary housing requirement with related updates to the City’s density bonus requirements.

The proposed ordinance (Article 29 – Affordable Housing Ordinance, Attachment 1) has the following components:

- **Purpose and Definitions** – Describing the intent of the ordinance and clarifying terms for affordable housing and related programs.
- **Applicability** – Describing which projects are subject to the requirement.
- **Requirements for Affordable Housing** – Stating the percentages of required units for ownership and rental projects, as well as the level of affordability.
- **Payment of a Housing Impact Fee** – Describing how projects pay the impact fee and exemptions.
- **Affordable Unit Standards** – Requiring certain standards for affordable units, including quality of construction, availability of occupancy and duration of affordability.
- **Alternatives** – Creating alternative means of compliance in case of specific circumstances.
- **Waiver of Requirements** – Option to request a waiver from the requirement.
- **Housing Fund and Enforcement** – Sections carried over from the Impact Fee Ordinance.

Related to these changes, staff is recommending an update to the City's Affordable Housing Density Bonuses requirements (Section 32.19). The State of California requires municipalities to adopt a density bonus ordinance, which clarifies the submittal requirements, review timelines, and review procedures for eligible development. The State’s density bonus provisions (Government Code 65915) allows greater residential densities than the maximums allowed by local zoning or the General Plan. In addition,
the State’s provisions allow concessions from local development standards and provides developers with incentives to create more affordable units. Concessions can include additional building height, reductions in setbacks, and reductions in parking. The proposed amendments to the City’s density bonus ordinance will bring our code into compliance with the State’s density bonus provisions and will help developers understand the local submittal requirements and concessions that may be considered without additional financial analysis.

Staff is also recommending that the Affordable Housing Impact Fee ordinance in the Municipal Code be incorporated into the new Article 29 of the Zoning Ordinance and revised as further described below to ensure consistency in affordable unit requirements. Finally, staff is proposing a resolution with a new affordable housing in-lieu fee. The fee would apply where the calculation of required on-site affordable units results in a fraction, or as an alternative for projects that do not provide on-site units and with an average unit size of 2,000 square feet or four bedrooms.

**Analysis**

There are benefits and drawbacks to requiring on-site affordable units through an inclusionary ordinance rather than payment of an affordable housing impact fee. The benefits are significant. Affordable units in market-rate developments can be constructed more quickly than nonprofit affordable units, which require more time for financing. In addition, construction of affordable units throughout different neighborhoods can meet a wider array of housing needs than concentrating a larger number of units in one development as a traditional 100 percent affordable project. The presence of affordable units within each residential project provides more opportunities for residents to remain in the community.

The drawbacks relate to how an inclusionary requirement can increase the costs of development and potentially reduce residential construction. The goal of an inclusionary requirement is to produce additional affordable housing. This goal is unachievable if increased construction costs due to the inclusionary requirement are too high and discourage residential development. Another potential drawback of onsite units versus a fee is that it reduces City funds that can be used for other affordable housing projects, such as the recently approved Bradford Street project (117 very low-income senior units). This type of project is possible when the City has funds to contribute to a housing nonprofit’s project. Lastly, an inclusionary ordinance can require significant administration to ensure that small numbers of affordable units across multiple projects are rented or owned by qualified residents.
Finding the right balance between these tradeoffs is a key consideration for this new policy. To assess feasibility of an inclusionary requirement and in-lieu fee amount, the City commissioned a report from Baird + Driskell Community Planning of real estate development economics and an affordable housing technical analysis that was used to develop options for consideration. The results of that analysis are included in Attachment 3 and incorporated below. As this is a complicated issue, staff has also augmented this report analysis with a Supplemental Information sheet found in Attachment 2. It provides further information and resources on common questions and concerns. With the above tradeoffs in mind, staff considered the following areas of analysis for this ordinance.

**Figure 1 – Areas of Analysis**

Survey of Other Cities and Redwood City Needs Analysis – Prior to detailed analysis, staff conducted a survey of surrounding cities’ affordable unit requirements (see Attachment 2, Supplemental Information). Overall, staff found some variation both for the minimum project size for the program and the percentages and targeted affordability. While there is a general average of 10-15% affordable with minimum number of units at 10, other cities, including South San Francisco and San Francisco have a 20% requirement or higher.
Nearby cities have different percentage requirements, depending on individual market conditions and city goals. Redwood City’s RHNA sets city-specific targets for housing needs by income. Generally, while progress has been made towards low-income units, the City is deficient in progress towards moderate and very low income units.

Table 1 - Redwood City Progress Towards RHNA Goals

<table>
<thead>
<tr>
<th>RHNA Target</th>
<th>Building Permits Issued</th>
<th>Pending or Approved Units</th>
<th>Remaining Need if all Pending and Approved Units Constructed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Very Low</td>
<td>706</td>
<td>7</td>
<td>159</td>
</tr>
<tr>
<td>Low</td>
<td>429</td>
<td>57</td>
<td>191</td>
</tr>
<tr>
<td>Moderate</td>
<td>502</td>
<td>0</td>
<td>3</td>
</tr>
<tr>
<td>Market Rate</td>
<td>1,152</td>
<td>1,645</td>
<td>N/A</td>
</tr>
</tbody>
</table>

The City has the following affordable units either pending or approved (but no building permits issued):
- 191 low income units (1401 Broadway, 353 Main Street, Habitat project, and 1601 El Camino Real)
- 159 very low income units (707 Bradford (senior housing), 1401 Broadway, 504 El Camino Real, and 353 Main Street)
- 3 moderate income units (353 Main Street)

To create more variety in affordability levels, additional focus on the moderate and very low income unit category is needed. However, for the purposes of the recent SB 35 law, Redwood City will continue to be subject to the streamlining requirement (projects with 50% affordable units or more) if the goals for Very Low or Low Income units are not met. Moderate Income units will not count towards SB 35 streamlining exemptions.

How many affordable units should be required, and what level of affordability? The economic analysis considered the additional cost impact on the feasibility of market-rate
projects and the corresponding density bonuses and concessions developers could request under state law. If an inclusionary percentage requirement is too costly and the incentives too small, the project may not “pencil,” resulting in reduced construction of new housing. A reduction in new housing construction also reduces the number of new affordable housing units that may be created.

For example, a 15% requirement for a 100-unit project would result in 15 affordable units considering project factors such as land value, construction costs, and expectations of a reasonable profit. A 25% requirement on the same site with similar project factors could add 25 affordable units, but if the requirement results in a project that is financially infeasible, the resulting construction of affordable units for that project is zero. The State Housing and Community Development Department (HCD) may further review ordinances exceeding 15% mandated affordable units for low-income and very low income households to ensure the requirement does not reduce overall residential construction. The options below do not exceed this requirement.

Inclusionary Percentage Options
To ensure feasibility and effectiveness, the City should consider a balance between the percentage of affordable units required and the level of affordability. Greater affordability results in a higher cost to the project developer, potentially reducing the total number of units (marker-rate and below-market-rate) that may be feasible. In addition, affordable housing percentages that align with state density bonus incentives are important for ensuring feasibility and effectiveness. With that in mind, staff developed several options for consideration.

Staff recommends an option requiring affordability for a variety of levels within each project as shown in Table 2. At the Planning Commission meeting of May 1, there was significant discussion about the benefits of that option versus for an option where a developer has more choice and flexibility in the level of affordability provided. More info on this discussion is included in the Alternatives section.

<table>
<thead>
<tr>
<th>The “Mix of Incomes” Option</th>
<th>The “Choice of Affordability” Option</th>
</tr>
</thead>
<tbody>
<tr>
<td>Affordability for a variety of levels within each project</td>
<td>Applicants may choose targeted affordability levels</td>
</tr>
<tr>
<td>Rental</td>
<td>10% Moderate Income AND 5% Low Income AND 5% Very Low Income Allows applicant to request an alternative of equal or greater value</td>
</tr>
</tbody>
</table>

Table 2 – Options for Percentage Requirements
Both options establish expectations for the developer and are feasible. However, there are different tradeoffs. The Choice of Affordability option allows developers to pick a level of income and number of units (and associated density bonus incentives) that make sense for their project. However, this reduces the City’s ability to obtain a preferred level of affordability in each project in order to address the needs at any given time. The City’s Strategic Initiative on Housing promotes housing at all income levels, and the Mix of Incomes option better addresses that concern. Additional language would permit applicants to request an alternative at an equal or greater value to the requirement, providing needed flexibility.

**STAFF RECOMMENDATION:** “Mix of Incomes” option requiring affordability for a variety of levels within each project. Staff also suggests a provision allowing developers to propose alternative percentages and levels of affordability as part of their housing plan as long as the financial value meets or exceeds the value of the requirement.

What is the minimum project size needed for on-site affordable units? Generating the maximum number of affordable units helps to meet RHNA goals. Project size thresholds in nearby cities vary, but generally average around a minimum size of 10 units. However, setting the threshold to 10 units may create drawbacks. Requiring onsite affordable units will allow developers to request concessions, which could create more variability in the building envelope for new development, a concern in existing neighborhoods.

Producing deed-restricted affordable housing results in a certain amount of administrative costs. Administration means ensuring that the units are rented or sold to qualified residents and that appropriate documentation is maintained. Historically, this has been challenging for property managers of market-rate projects, resulting in out-of-compliance units and adding a significant administrative burden for the City. Balancing the goals of providing units while maximizing efficiency is critical.

Generally, affordable unit programs such as an inclusionary requirement have the most beneficial impact with larger residential projects. The larger residential developments result in more affordable units, simplifying the administrative process. In order to assess the production of affordable units between projects, staff looked at the total number of units for eight pending projects. As the table below shows, with a 20% affordable unit requirement, five large products would have produced 232 affordable units, while three small projects produce only four affordable units.
Table 3 – Production of Affordable Housing based on Project Size

<table>
<thead>
<tr>
<th>Pending Projects</th>
<th>Total Units</th>
<th>Affordable Units Required (20%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Five projects of 20 units or more</td>
<td>1,292</td>
<td>232</td>
</tr>
<tr>
<td>Three projects of less than 19 units</td>
<td>39</td>
<td>4</td>
</tr>
</tbody>
</table>

It is possible that the cost of providing affordable units would be an incentive to reduce the total number of units to avoid the 10-unit threshold, further reducing the number of affordable units. Alternatively, instead of reducing the total number of units, the developer could request concessions from development standards to make the smaller project financially feasible.

For these reasons, staff and the Planning Commission are recommending that the inclusionary requirement apply to projects with 20 units or more and that projects between 5-19 units would pay an affordable housing impact fee, resulting in funds that will be used towards affordable housing programs. However, as an alternative the City Council may consider an alternative threshold, such as 10 units or more. Under the proposed ordinance, projects between 5-19 units could instead provide affordable units on-site or an alternative mitigation program could be proposed.

**STAFF RECOMMENDATION:** Minimum of 20 units for individual residential projects. Projects of 5-19 units will continue to pay the housing impact fee.

**How does the state density bonus law relate to inclusionary requirements?**
The state density bonus law increases the economic feasibility of affordable unit construction. The additional market-rate units and concessions from development standards help to off-set the developer costs of providing affordable housing units. Affordability levels within the inclusionary ordinance could align with the requirements of the state density bonus law in order to incentivize production of affordable housing.
Table 4 – Options with State Density Bonus

<table>
<thead>
<tr>
<th>Percent Affordability</th>
<th>Bonus Density</th>
<th>Number of Concessions</th>
</tr>
</thead>
<tbody>
<tr>
<td>5% Very Low</td>
<td>20%</td>
<td>1</td>
</tr>
<tr>
<td>12% Very Low</td>
<td>35%</td>
<td>2</td>
</tr>
<tr>
<td>5% Low</td>
<td>None</td>
<td>0</td>
</tr>
<tr>
<td>15% Low</td>
<td>27.5%</td>
<td>1</td>
</tr>
<tr>
<td>10% Moderate (Ownership)</td>
<td>5%</td>
<td>1</td>
</tr>
<tr>
<td>15% Moderate (Ownership)</td>
<td>10%</td>
<td>1</td>
</tr>
<tr>
<td>20% Moderate (Ownership)</td>
<td>15%</td>
<td>2</td>
</tr>
</tbody>
</table>

Concessions granted through state density bonus could include additional height beyond what the zoning district allows, reduced setbacks or other site development deviations. In addition, density bonus projects also automatically qualify for a reduced parking rate, apart from the allowed concessions.

Per state law, cities must adopt density bonus submittal requirements and specify preferred concessions and incentives. The amendments to Section 32.19 (Attachment 1) provides application requirements, and creates a two-tier system for concessions. Preferred concessions do not require separate financial analysis, while all other concessions do require the analysis. In all cases developers will be required to submit a narrative explaining why they are requesting the concession, and the review authority must approve the concession unless certain specific findings could be made.

The Planning Commission recommends a broad list of preferred concessions, including: building height, parking and rear yard setback, but not including the deferred payment of development impact fees, as further explained below. Deviations not listed would require financial analysis identifying how the incentive reduces costs and allows for the production of affordable housing.

**STAFF RECOMMENDATION:** Update the State Density Bonus section to reflect the bonuses and concessions that may be granted to projects providing on-site affordable units.
How does this new requirement relate to the affordable housing impact fee and other programs? The City currently has an impact fee that applies to all new residential development of five or more units and nonresidential development over a certain size. This fee is intended to partially mitigate the affordable housing impacts generated by new residential and commercial development. This fee would continue for all applicable commercial projects and residential projects of 5-19 units. Projects over 20 units would be subject to the inclusionary requirement described above.

The proposed ordinance includes alternatives to payment of the housing impact fee or the construction of on-site affordable units. As an alternative to the construction of affordable units, developers would have the option to pay an “in-lieu” fee in the following instances:

- When a inclusionary requirement results in a fraction of a unit
- Upon satisfying certain findings, applicants would be able to pay an in-lieu fee for the entire inclusionary requirement. This would apply where the in-lieu fee covers the cost of providing an equivalent number of affordable units, based upon an affordability gap analysis, and only to projects with larger units (i.e. an average unit size of 2,000 square feet or four bedrooms).

Generally, in-lieu fees are calculated on a per unit basis and are more expensive than a traditional impact fee. This is intended to accurately capture the value of providing an on-site unit without modifications to encourage feasibility. Although payment of an in-lieu fee might appear to be an attractive option, developers paying the fee would give up the ability to include market-rate density bonus units, concessions or incentives, and waivers from development standards. The analysis suggests setting the rate at $400,000 per rental affordable unit required. This fee is substantially higher than the current impact fee. For ownership projects, staff is recommending that individual projects submit an affordability gap analysis and that the in-lieu fee be the amount of the gap. The in-lieu fee is set by resolution of the City Council in Attachment 4.

**STAFF RECOMMENDATION:** Establishing an in-lieu fee in the master fee schedule that is consistent with the cost of providing an affordable unit. This in-lieu fee would be significantly higher than the current impact fee and would be approved in a resolution as part of Council action.

When does the new requirement take effect? On December 18, 2017, the Council initiated proceedings to consider the new requirement and staff has been communicating with developers of in-process projects regarding the potential impacts of
this ordinance. Notice of the initiation was published on May 4, 2018. Staff recommends that all projects with applications complete after May 4, 2018 be subject to the new ordinance. These projects include the City Plaza project (Sobrato), 504 El Camino Real (mixed use office and residential) and 557 E. Bayshore (Syufy).

Other revisions. After the Planning Commission meeting, other clarifying edits were made to the ordinance. A definition of the existing term “extremely low income households” was added and referenced in the definition of “affordable unit.” Also, in order to formalize the existing process of determining eligibility to occupy a unit, the concept of a Below Market Rate Tenant Selection and Management Plan was added along with a corresponding definition. Further, the definition of “moderate income households” was revised to eliminate an outdated reference to HUD-published moderate income limits. The process of recording affordable housing agreements, and the timing of collecting in-lieu fees (before the issuance of building permits) has also been clarified. Finally, other alternatives that may be considered now also include alternatives to standards for affordable housing, in order to allow flexibility when a project provides greater affordable housing benefits than required.

PUBLIC NOTIFICATION AND COMMENT
On December 18, 2017, City Council initiated proceedings to consider an inclusionary housing requirement. Staff also developed an email list of interested parties from the previous Affordable Housing Impact Fee program, as well as recent development applications and provided notice of this hearing. Lastly, staff created a website at www.redwoodcity.org to provide information and resources on this requirement.

Staff brought the proposed recommendation to the Housing and Human Concerns Committee at their April 24, 2018 meeting. After the presentation they asked clarifying questions about state density bonus, differing percentages and minimum project size. They expressed support for an inclusionary ordinance.

Staff has also received comment letters from developers, one stating it is too restrictive and expressing concern for the requirement and one requesting flexibility. The letters are available in Attachment 5.

Planning Commission considered this item at their meeting Of May 1, 2018. Several members of the public spoke on the item. The comments suggested there was a need for affordable housing but emphasized flexibility in requirements. The Planning Commission discussed this input and there was discussion about additional public input into the process. Further discussion of their action is located in the Alternatives section.
**GENERAL PLAN AND ZONING COMPLIANCE**

- Goal H-2 - Promote, encourage, and assist in the development of housing that meets the needs of all socio-economic segments of the community.
- Policy H-2.1 - Pursue and maximize the use of State, federal, local, and private funding for the development, preservation and rehabilitation of housing affordable to very low, low, and moderate income households.
- Policy H-2.5 - Consider various avenues to ensure the provision or construction of affordable housing and other community benefits.

**ALTERNATIVES**
The Planning Commission considered the two alternatives for percentages and levels of income. The initial vote on the Mix of Incomes option resulted in a 3-3 tie (one seat is vacant on the Commission). After further discussion, and based on concerns that the “Mix of Incomes” option was too prescriptive and not flexible enough, Planning Commission recommended the Choice of Affordability option, while retaining the proposed language allowing for flexibility in Section 29.4(A)(1) (passed 5-1 with Commissioner Schmidt dissenting. Commissioner Schmidt recommended additional public outreach and input from the community prior to the Planning Commission making a recommendation). The Planning Commission also recommended that the concession allowing deferred payment of impact fees be struck and that reporting on the ordinance be required every three years. The concept of creating flexibility in the definition of “affordable rent” to lessen the burden of administering projects with multiple sources of funding was also presented, and has been incorporated into the ordinance.

Staff concurs with the recommendations on concessions and reporting, and incorporated the first recommendation in the ordinance, and the latter recommendation into the proposed Council action. However, staff is continuing to recommend the Mix of Incomes option. Planning Commission expressed concerns about adequate flexibility, and staff has drafted the Mix of Incomes option allowing developers to propose alternative methods of compliance, provided the value of the affordable housing is equal to or exceeds the Mix of Income (10% moderate, 5% low, and 5% very low) requirement. The “Alternative Methods of Compliance” choice could be further stressed in outreach material, to stress the exact percentages of affordable units is not set in stone, but a mixture of affordable units is preferred.

The City Council may:

1. Modify the recommendation, such as:
   a. Lowering the minimum project size requirement to 10 units or more
   b. Changing the percentage of affordable units or level of affordability
   c. Listing alternative preferred concessions
   d. Other modifications
2. Request more information prior to making a recommendation.
3. Recommend that the City Council not adopt an inclusionary requirement.

**Fiscal Impact**
The proposed ordinance will require staff administration. As part of the most recent Master Fee Schedule update, the City created an hourly fee for training and monitoring. This fee is intended to recover the cost of administering the program. Staff could use the fee to partner with an outside agency to assist with administrative requirements.

**Environmental Review**
The proposed ordinance does not meet the definition of a project as there is no possibility for a direct physical change in the environment or a reasonably foreseeable indirect change on the environment, under CEQA Guidelines Section 15378. The propose in-lieu fee resolution is likewise not a project under CEQA Guidelines Section 15378(b)(4) as a governmental funding mechanism that does not involve any commitment to any specific project. In addition, under CEQA Guidelines Section 15061(b)(3), both the proposed ordinance and in-lieu fee resolution are exempt from CEQA as it can be seen with certainty that there is no possibility for causing a significant effect on the environment. Changing the requirements for affordability of the units and enacting the fee will not alter the physical development standards such as height, setbacks, lot coverage, density or other requirements.

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ATTACHMENTS

1. Ordinance Amending the Zoning Ordinance to Create Article 29 (Affordable Housing Requirement), Move Affordable Housing Impact Fee Regulations from the Municipal Code to New Zoning Ordinance Article 29, and related amendments to Section 32.19 (Affordable Housing Density Bonuses)
2. Resolution instituting a new In-Lieu Fee
3. Supplemental Information and Frequently Asked Questions
4. Technical Memo Analyzing Feasibility of Various Affordable Housing Requirements
5. Comments from the Public

RELATED SOURCES AVAILABLE ON WWW.REDWOODCITY.ORG
2. Existing Density Bonus Section 32.19
3. Existing Affordable Housing Impact Fee Article XVII of Chapter 18 of the Municipal Code