# Attachment 3

## CITY OF RIVERSIDE INCLUSIONARY HOUSING PROGRAM STUDY

Housing and Homelessness Committee Meeting Update February 28, 2022



949 South Hope Street, Suite 103 • Los Angeles, CA 90015 213.489.3838 • www.epsys.com

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#### **AGENDA**

- Study Process To-Date
- Review of Inclusionary Housing Policies in Other Cities
- Review of Feasibility Analysis
- Overview of Stakeholder and Community Outreach To-Date
- Preliminary Recommendations for City Program
- Discussion

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#### STUDY PROCESS TO-DATE

#### May 2021

· EPS engaged by City

#### June-August 2021

· EPS preliminary technical analysis

#### September 2021

 Presentation of preliminary findings to Housing and Homelessness Committee

#### November 2021

· Meetings with targeted stakeholder groups

#### January 2022

· Community town hall presentation

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#### AFFORDABLE HOUSING CONTEXT FOR RIVERSIDE

#### Riverside Affordable Housing Standards for 2021

		Multifamily Rental Units		П	For-Sale Townhome Units		Single Family For-Sale Units	
Affordability Category	6th Cycle RHNA Allocation	2021 Max Income (3 person household) <sup>1</sup>	Maximum Rent (2-bedroom unit) <sup>2</sup>		2021 Max Income (4 person household) <sup>1</sup>	Maximum Sale Price (3-bedroom home) <sup>3, 4</sup>	2021 Max Income (5 person household) <sup>1</sup>	Maximum Sale Price (4-bedroom home) <sup>3</sup>
Extremely Low Income (ELI) - 30% AMI Very Low Income (VLI) - 50% AMI Low Income (LI) - 70% AMI Moderate Income (MOD) - 110% AMI Above Moderate Income - >120% AMI	2,431 2,430 2,064 3,139 7,394	\$21,960 \$35,550 \$49,802 \$76,725 N/A	\$549 \$889 \$1,245 \$2,238 N/A		[6] \$39,500 \$55,335 \$85,250 N/A	[6] \$114,440 \$202,498 \$423,481 N/A	[6] \$42,700 \$59,762 \$92,070 N/A	[6] \$147,845 \$239,779 \$478,887 N/A
Typical Market Rates [5]			\$2,571			\$400,000		\$625,000

<sup>[1]</sup> Income levels are based off the median household income for Riverside County, as reported by CA HCD.

[6] Inclusionary programs do not typically include ELI requirements for-sale housing

Sources: State of CA HCD; City of Riverside; CoStar; Zillow; EPS

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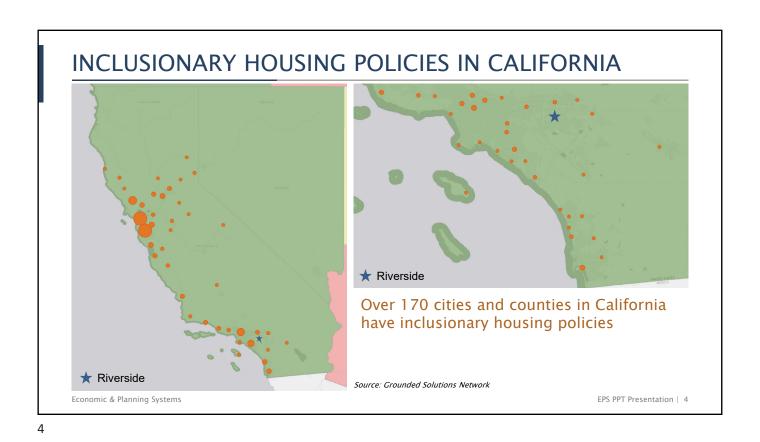
 $<sup>[2]</sup> Maximum \, rent \, for \, each \, income \, level \, is \, based \, on \, 30\% \, of \, maximum \, income \, for \, ELI, \, VLI, \, and \, LI; \, and \, 35\% \, of \, maximum \, income \, for \, MOD.$ 

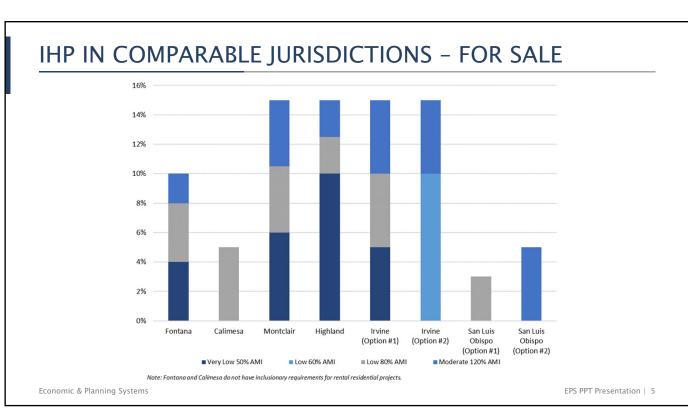
<sup>[3]</sup> Maximum sale price for each income level assumes mortgage payment equal to 30% of maximum monthly income for ELI, VLI, and LI, and 35% of maximum monthly income for MOD (minus taxes and insurance), on a 30-year mortgage with a 3.5% annual interest rate and 10% down payment.

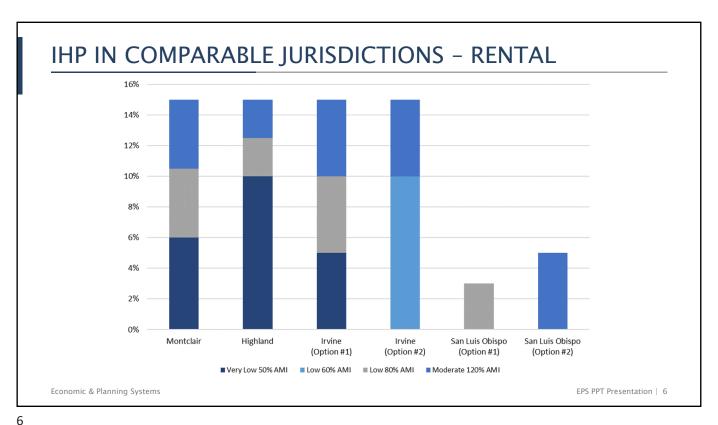
[4] The maximum sale price for four-person households at moderate income is higher than the estimated market-rate price for townhome products in Riverside. Therefore, EPS's analysis does not include moderate-income inclusionary requirements for

<sup>[4]</sup> The maximum sale price for four-person households at moderate income is higher than the estimated market-rate price for townhome products in Riverside. Therefore, EPS's analysis does not include moderate-income inclusionary requirements for townhomes.

<sup>[5]</sup> Based on EPS market research. Estimated rates are for 2-bedroom, 850 sq. ft. rental unit; 3-bedroom, 1,500 sq. ft. for-sale townhome; and 4-bedroom, 2,500 sq. ft. single family home







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#### FEASIBILITY ANALYSIS

- Developed prototype rental and for-sale market-rate products that the City might see developed in the future.
- Tested feasibility of several scenarios of developing on-site affordable units, using typical return metrics
  - > 5.25% return on cost for rental projects
  - > 15% profit margin on for-sale projects
- Also estimated an in-lieu fee and assessed the feasibility impacts of paying fee as compared to building on-site units
  - Fee calculated as subsidy needed to support development of affordable units off-site (Unit value at affordable levels - Cost of building unit)
  - EPS calculated fees for select inclusionary requirements if City opts to include fee option, calculation will be updated to reflect preferred requirement

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#### PROTOTYPE PRODUCTS



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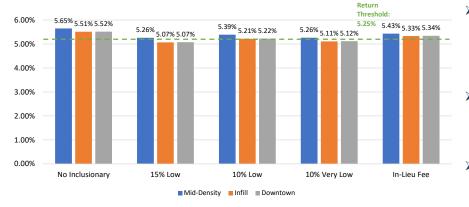


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#### INCLUSIONARY SCENARIOS - RENTAL

- Scenarios for multifamily rental include:
  - 15% and 10% of units for low-income households
  - 10% of units for very low-income households
  - In-lieu fee on 10% low-income requirement (~\$13,000 per market rate unit)



- Higher density projects achieve lower return on cost, and options for including affordable units are limited
- Mid-density projects have more room to feasibly include affordable units
- Payment of in-lieu fee is a feasible option

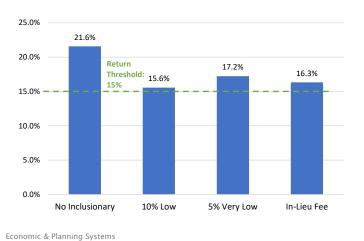
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#### INCLUSIONARY SCENARIOS - FOR SALE TOWNHOMES

- Scenarios for for-sale townhomes include:
  - 10% of units for low-income households
  - 5% of units for very low-income households
  - In-lieu fee on 10% low-income requirement (~\$17,000 per market rate unit)



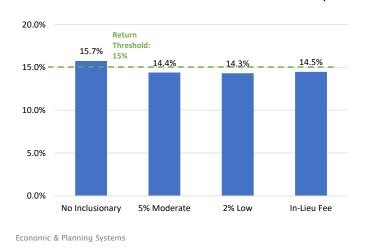
- Townhome projects achieve yield on cost well above threshold without affordable units
- Both inclusionary scenarios and payment of in-lieu fee would still produce a feasible yield on cost

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#### INCLUSIONARY SCENARIOS - FOR SALE SINGLE FAMILY

- Scenarios for single family detached homes include:
  - 5% of units for moderate-income households
  - 2% of units for very low-income households
  - In-lieu fee on 5% moderate-income requirement (~\$7,000 per market rate unit)



- Single family projects just barely achieve profit margin threshold without affordable units
- Both affordable scenarios and payment of the in-lieu fee would produce a barely feasible profit

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#### SUMMARY OF FEASIBILITY RESULTS

- For-sale single family home products are limited in feasibly providing inclusionary units
- For-sale townhomes products appear able to support inclusionary requirements, but are a less common product
- Multifamily rental products at ~30 units/acre appear to feasibly support inclusionary requirements, and are a common product
- Higher-density multifamily rental products in and near Downtown tend to have higher costs, and providing affordable units is less feasible
- Payment of <u>in-lieu fee</u> yields a higher return than providing on-site units

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#### STAKEHOLDER FEEDBACK

- EPS hosted two stakeholder workshops in November 2021, and presented to the Riverside Chamber of Commerce's Economic Development Council in January 2022
- Workshop #1 included housing advocates and developers of affordable housing projects. Seven stakeholders attended the meeting, and provided following primary feedback:
  - Importance of including affordable units in market-rate developments, to avoid clustering of affordable units in existing low-income areas of City
  - Some but not unanimous support for consideration of in-lieu fee option, as it can result in more affordable units in the long-run through funding leverage
  - Program should include option for land donation and/or collaboration with nonprofit builders for separate buildings to meet inclusionary requirement - would be relevant for larger projects
  - Encouraging City to explore other tools for developing permanent/long-term affordable housing, including co-ops and community land trusts, and other funding sources such as transient occupancy tax (TOT)

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#### STAKEHOLDER FEEDBACK

- Workshop #2 included developers of market-rate residential projects. Sixteen stakeholders attended the meeting and provided following primary feedback:
  - Desire for flexibility from City in negotiating on a project-by-project basis, to reflect that every project has unique cost factors
  - Concern that feasibility models may underestimate development costs, in which case financial returns are overestimated and projects may be less able to absorb the costs of inclusionary requirements
  - Interest in having incentives that will reduce costs elsewhere in a project, although higher density allowances do not always improve project feasibility because construction costs can increase
  - Combined with other City policies that are adding costs to development, such as VMT reduction and electrification policies, addition of inclusionary requirements can push a lot of projects into infeasibility
  - Better option to get affordable units is to support building of 100% affordable projects on City-owned land; alternately, City should share in cost of inclusionary requirements somehow

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#### **COMMUNITY FEEDBACK**

- EPS and City hosted a community webinar on January 12, 2022
- Approximately 50 individuals signed on to meeting
- Primary feedback included:
  - Overall support for an inclusionary housing policy
  - Preference to require units on-site rather than allow in-lieu fee; fee should be higher than cost of providing on-site units to discourage the fee option
  - Questions about other means of encouraging development of affordable units, such as density bonuses (which the City and State do have)
  - Stated need for provision of affordable housing that serves special needs population

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#### **ELEMENTS OF AN INCLUSIONARY HOUSING POLICY**

Cities have wide latitude in structuring inclusionary policy – there is no "one size fits all"

- Inclusionary Requirement: Proportion of new units that must be affordable
- Affordability Levels: Income levels that are served by affordable units
- Included/Exempted Developments: Can include a minimum project size or particular project types
- Requirements for rental vs. for-sale units
- District-based Requirements
- In–Lieu Fee Option

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#### PRELIMINARY RECOMMENDATIONS

Given EPS's research and analysis, and the stakeholder and community feedback, we would make the following preliminary recommendations to the City in developing an inclusionary housing program:

- 1. Inclusionary requirements
  - a. Multifamily 10% of units affordable to low-income households (70% AMI)\*
  - b. Townhome 10% of units affordable to low-income households (70% AMI) \*
  - c. Single family 5% of units affordable to moderate-income households (110% AMI) \*These requirements would automatically qualify projects for use of State density bonus
- 2. Develop an in-lieu fee to align with the above requirements
  - Allowances for payment of fee should be based on City priorities (e.g. encouraging on-site units/mixed-income properties vs. maximize local support for affordable projects)
- 3. Consider a phased-in approach for requirements to allow markets to adjust, and set timeline for revisiting requirements in light of new market conditions

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### Questions/Discussion

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#### TOPICS FOR DISCUSSION/FEEDBACK

- Questions/concerns/feedback regarding recommended inclusionary requirements
  - > Changes to requirements? Exemptions for any uses?
- City questions/preferences regarding use of in-lieu fee
  - > What are the priorities?
- Timeline for program implementation

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#### **COMMITTEE RECOMMENDATIONS**

- Receive an update on the Inclusionary Housing Program Study for the City of Riverside, including preliminary recommendations on inclusionary housing program requirements; and
- Provide staff with direction on how to proceed with the Inclusionary Housing Program Study.

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