

CITY COUNCIL OF THE CITY OF OXNARD

RESOLUTION NO. 15,330

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF OXNARD
ADOPTING THE AFFORDABLE HOUSING IN-LIEU FEE NEXUS STUDY AND
AFFORDABLE HOUSING IN-LIEU FEES.

WHEREAS, on October 10, 2017 the City adopted the 2013-2021 Housing Element of the General Plan in compliance with State law, which includes the goal of encouraging the development of affordable housing to meet the City's assigned share of the regional housing need; and

WHEREAS, in 1999 the City adopted an Inclusionary Housing Program, requiring developers to provide a percentage of their units at affordable prices and a policy to establish an affordable housing in-lieu fee to facilitate new housing units that are affordable to households with extremely low, very low and low incomes; and

WHEREAS, the City's inclusionary housing ordinance requires for-sale projects with at least 10 or more units, to reserve at least ten percent (10%) of all newly constructed dwelling units to be sold to lower-income households (80% AMI); and

WHEREAS, the City's inclusionary housing ordinance requires for-rent projects with at least 10 or more units, make available at least five percent (5%) of all newly constructed dwelling units to very low income (50% AMI or below) households, and 5% of all units to affordable lower-income (80% AMI) households; and

WHEREAS, Ordinance 2721 established the current Housing In-Lieu Fee; and

WHEREAS, the City wishes to update the in-lieu fees based on current affordability gaps; and

WHEREAS, the City's consultant Harris & Associates has completed the Affordable Housing In-Lieu Nexus Study dated April 2020, which sets forth the methodology used to determine the in-lieu fee; and

WHEREAS, the Affordable Housing In-Lieu fees established by this resolution are equal to or lower than the amount needed to fully mitigate the impacts of new for sale and rental residential projects as shown in the Nexus Study; and

WHEREAS, the fees are summarized in Exhibit A attached hereto and incorporated herein by this reference; and

WHEREAS, in accordance with Government Code Section 66016, at least 14 days prior to the public hearing at which the Council first considered the adoption of the Affordable Housing In-Lieu Fee, notice of the time and place of the hearing was mailed to eligible interested parties who filed written requests with the City for mailed notice of meetings on new or increased fees or service charges; and

Notice was published in the Vida Newspaper on April 30, 2020 and May 7, 2020 setting forth the time and manner of compliance with the requirements of law of providing notice of the time and place for the public hearing in the form and manner required by Government Code sections 66018, 6062(a) and 66019. Notice was also provided 14 days prior to the public hearing to those interested parties who have requested in writing, notification from the City of any fee increases.

WHEREAS, in accordance with Government Code Section 66016, the Affordable Housing In-Lieu Fee Nexus Study containing the data supporting the imposition of the Fee, was made available for public review and comment for 10 days prior to the public hearing at which the Council first considered the adoption of the Fee; and

WHEREAS, ten days advance notice of the public hearing at which the Council first considered the adoption of the Fee was given by publication in accordance with Section 6062a of the California Government Code; and

WHEREAS, the fees shall be adjusted each year beginning on July 1st of 2021 using the percentage increase or decrease for the prior twelve months as determined by the Engineering News Record Building Cost Index for the Los Angeles Region.

WHEREAS, the City Council finds that there is a reasonable relationship between the amount of the fee and the cost attributable to new development.

NOW, THEREFORE, the City Council of the City of Oxnard resolves as follows:

1. That it does hereby approve the Affordable Housing In-Lieu Study and Schedule of Affordable Housing In-Lieu Fees, prepared by Harris & Associates attached hereto as Exhibit A establishing revised fees.
2. The Affordable Housing In-Lieu Fees established in Exhibit B and incorporated by this reference are hereby adopted.
3. The City Manager is hereby authorized on July 1st of each year to adjust the fees using the June Engineering News Record Building Cost Index for the Los Angeles region.
4. The City Council finds that City staff have evaluated the potential environmental impacts of the adoption of this Ordinance, the approval of the *Affordable Housing In-Lieu Fee Nexus Study* prepared by Harris & Associates and dated April 2020, and the updated Affordable Housing In-lieu Fee pursuant to the California Environmental

Quality Act ("CEQA"). City staff has determined that these actions do not constitute a "project" under CEQA pursuant to State CEQA Guidelines Section 15378(b)(4) because these actions involve the creation of a government funding mechanism which does not involve any commitment to any specific project which *may* result in a potentially significant physical impact on the environment.

5. The City Manager is hereby authorized to take whatever actions are necessary and appropriate to carry out the purpose and intent of this Resolution.

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PASSED AND ADOPTED THIS 19th day of May, 2020, by the following vote:

AYES: Councilmembers Basua, Flynn, Lopez, Madrigal, Perello and Ramirez.

NOES: Councilman MacDonald.

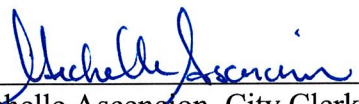
ABSENT: None.

ABSTAIN: None.

 5/19/20


Tim Flynn, Mayor

ATTEST:



Michelle Ascencion, City Clerk

APPROVED AS TO FORM:



Stephen M. Fischer, City Attorney

EXHIBIT A



FINAL DRAFT

Affordable Housing In-Lieu Fee Nexus Study

City of Oxnard

April 8, 2020

Prepared for:



Prepared by:



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EXECUTIVE SUMMARY

INTRODUCTION

The City of Oxnard (City) retained Harris & Associates (Harris) to prepare an Affordable Housing In-Lieu Fee Nexus Study (Study) in order to update previously adopted Affordable Housing In-Lieu Fees (Fees) contained in Ordinance 2721 adopted July 18, 2006. The Fees provide additional flexibility to the City and development community in meeting affordable housing needs generated by new market-rate units in the City.

This Study provides a nexus analysis of the linkages between the new development of residential units and the need/demand for additional affordable housing for informational purposes. This Study also analyzes the reasonable relationship between new residential development and the Fee amounts under assumptions that are consistent with the City's existing Inclusionary Housing Ordinance. The Fees in this Study represent the maximum fees supported but do not represent specific Fee recommendations. The City has the latitude to adopt the Fees deemed appropriate.

FINDINGS AND METHODOLOGY

Table ES.1 compares the City's existing in-lieu fees, the supportable fees under the demand based model, the supportable fees using under the equivalent inclusionary cost, and the in-lieu fees in other local cities.

Table ES.1: Maximum Supported Fee Comparison

| | Existing In-Lieu Fee ¹ | Demand Based Supportable Fee ² | Inclusionary Equivalent Supportable Fee ³ | Local City Survey ⁴ |
|------------------------|-----------------------------------|---|--|--------------------------------|
| Single-Family For-Sale | \$7,000 | \$99,111 | \$44,700 | \$36,026 |
| Multifamily For-Sale | 5,500 | 70,180 | 36,800 | 34,951 |
| Multifamily For-Rent | 7,735 | 53,029 | 28,400 | 23,147 |

1) Using the median sales price estimate from January 2020 Multiple Listing Service (MLS) survey, for-rent fee per January 2020 fee update.

2) Tables 13, 14, 15.

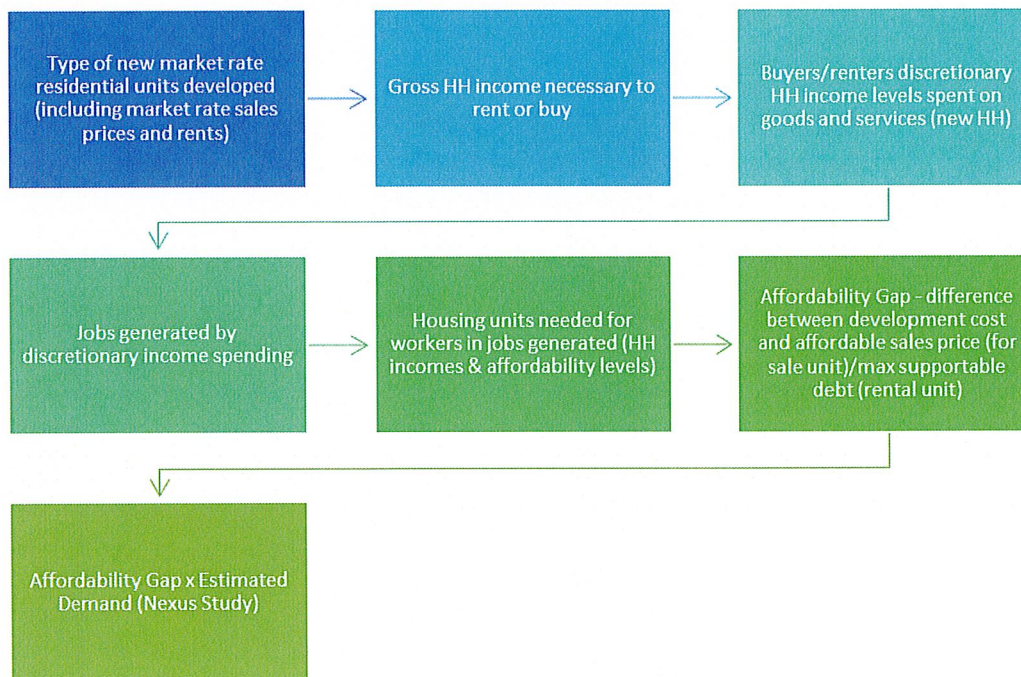
3) Tables 16 and 17.

4) Table 19.

The existing in-lieu fee is based on the requirements of the existing Inclusionary Housing Ordinance. The Demand-Based Supportable Fee represents the gap in affordability created by new low-income households generated by new market rate development in the City. The Inclusionary Equivalent Supportable Fee is the gap in affordability under the affordable unit production requirement in the existing Inclusionary Housing Ordinance. Finally, the Local City Survey numbers represent the average in-lieu fees required by surrounding cities. Harris staff completed the analysis using two methodologies to determine the maximum supportable Fee for the City.

The first portion of the analysis determines the demand created by the development of market-rate residential units for affordable housing units. The demand for affordable housing units at various income levels is then used to calculate the “affordability gap”. For ownership housing units, the sales price needed for units to be affordable to low-income households is compared to the cost to develop these units to calculate the “affordability gap.” For rental units, the development cost is compared with income sources available for housing to determine the “affordability gap”. The figure below illustrates this methodology.

Demand-Based Fee Methodology



The second portion of the analysis involves applying the affordability gap calculations per unit to both the estimated affordable housing demand determined in the first portion of the analysis and the affordable unit requirements from the existing Inclusionary Housing Ordinance. The figure on the following page illustrates this methodology.

Inclusionary Equivalent Fee Methodology



The in-lieu fee estimates were based on three general development types:

- Single-family detached (SFR for-sale)
- Multifamily condominiums (MFR for-sale)
- Multifamily apartments (MFR for-rent)

In order to estimate future market-rate housing development in the City, Harris staff researched and reviewed new residential development projects from the City's website, the Multiple Listing Service data showing recently constructed units for-sale, and information from City staff to identify recent market trends related to home prices, and held interviews with local developers. The Fees calculated in this Study reflect the estimated cost of future residential development.

The household income limits as a percentage of area median income (AMI) for Ventura County are shown in Table ES.2. These threshold incomes are a key input to the economic impact analysis described in Section 1.

Table ES.2: Threshold Incomes and percent of Area Median Income (AMI)

| | Percent of AMI | 1 | 2 | 3 | 4 | 5 | 6 |
|------------------------|-------------------|----------|----------|----------|----------|----------|----------|
| Very Low Income | 0-50% | \$36,650 | \$41,850 | \$47,100 | \$52,300 | \$56,500 | \$60,700 |
| Low Income | 50-80% | 58,600 | 67,000 | 75,350 | 83,700 | 90,400 | 97,100 |
| Moderate Income | 80-120% | 82,150 | 93,900 | 105,600 | 117,350 | 126,750 | 136,150 |

Source: Ventura County Housing Authority Income Limits published 4/24/19.

POLICY CONSIDERATIONS

The City should evaluate several policy considerations and implications related to the in-lieu fees. Harris & Associates reviewed the maximum supportable Fees for consistency with the Housing Policy outlined in the City's Housing Element and has prepared a comparison of fees with other jurisdictions.

Housing Policy Consistency

The 2013-2023 Mid Cycle Housing Element, adopted in 2017, discusses the current affordable housing issues that exist within the City and details the City's existing Inclusionary Housing Program. The proposed Fees are consistent with the Housing Element's goal of providing opportunities for the development of adequate housing for households of all income levels.

Comparison to Other Jurisdictions

An analysis of comparable cities that require affordable housing in-lieu fees is below as a comparison to the maximum supported Fees as determined by this Study. Table ES.3 shows the average amount of affordable housing in-lieu fees collected per residential type in comparable communities in the region. See Table 19 for an in depth review of surrounding cities.

Table ES.3: Average Fee of Comparable Municipalities

| Land Use | Fee |
|-----------------------------------|----------|
| Single Family (Detached) | \$36,026 |
| Multifamily - For-Sale (Attached) | 34,951 |
| Multifamily - For-Rent (Attached) | 23,147 |

Source: See Table 20 for detailed local city survey.

Policymakers may choose to adopt a fee less than the maximum supported amount in order to lessen the burden on new development while still mitigating a portion of the affordable housing needs created from new development.

Proposed Fees

City staff reviewed the options provided in this analysis and is recommending the following fees be adopted. These fees fall below the maximum supportable fees calculated in this report and were determined based on an analysis of other local agencies. The maximum fee based on the City's existing ordinance was deemed higher than the market would bear for single family and multifamily for-sale units. Staff recommends lowering the fees to an amount more in line with competitive cities for the single family and multifamily for-sale units but setting the fee for for-rent units closer to the actual cost to develop a multi-family project. This methodology supports the City's goal of using the in-lieu fee funds to build multifamily for rent projects. See Table ES.4 for a summary of the recommended fees.

Table ES.4: Proposed Fees

| Land Use | Inclusionary Requirement ¹ | Affordability Level | Affordability Gap per Unit ² | Fee per Unit | Total Fee per Unit | Average of Other Cities ³ | Proposed Fee |
|--|---------------------------------------|---------------------|---|--------------|--------------------|--------------------------------------|--------------|
| Single Family Detached For-Sale | 10% | 80% AMI or below | \$447,023 | \$44,702 | \$44,702 | \$36,026 | \$36,000 |
| Multifamily For-Sale | 10% | 80% AMI or below | 368,534 | 36,853 | 36,853 | 34,951 | 35,000 |
| Multifamily For-Rent | 5% | 50-80% AMI | 234,315 | 11,716 | 28,407 | 23,147 | 28,000 |
| | 5% | 50% AMI or below | 333,823 | 16,691 | | | |

1) Per Ordinance 2721 adopted July 18, 2006

2) Table 10

3) Table 19

Section 1 INTRODUCTION AND METHODOLOGY

INTRODUCTION

The City desires to update the Inclusionary Housing In-Lieu Fee for new residential development to offer developers the option to pay an in-lieu fee rather than producing deed-restricted, affordable units pursuant to the City's Inclusionary Housing Ordinance (Ordinance Nos. 2615, 2688 and 2721) as part of any new residential development project of 10 units or more. The Fee is designed to mitigate the impact of an increase in affordable housing needed from the development of new market-rate residential units.

This Study establishes the maximum supported Fee levels related to residential development. The methodology establishes a reasonable relationship between the associated impact of new development, the amount of the Fee, and details the data sources and associated findings. More specifically, two methodologies were utilized to determine the maximum supportable Fee for the City. The first portion of the analysis determines the demand created by the development of market-rate residential units for affordable housing units. The demand for affordable housing units at various income levels is then used to calculate the "affordability gap". For ownership housing units, the sales price needed for units to be affordable to low-income households is compared to the cost to develop these units to calculate the "affordability gap." For rental units, the development cost is compared with income sources available for housing to determine the "affordability gap".

The second portion of the analysis involves applying the affordability gap calculations per unit to both the estimated affordable housing demand determined in the first portion of the analysis and the affordable unit requirements from the existing Inclusionary Housing Ordinance.

Background

This section discusses the City's historical Inclusionary Housing Policy and the results of recent legislation and judicial rulings.

City's Inclusionary Housing Ordinance

The City has historically used an Inclusionary Housing Policy originally established by Ordinance Nos. 2615 (adopted in 1999), 2688 (adopted in 2005) and 2721 (adopted in 2006) to generate affordable housing in proportion with the overall increase in market-rate residential units and is described in the Housing Element of the City's General Plan. The Policy requires the following for housing projects with 10 or more units:

- For-Sale: 10% of all units must be affordable to lower-income households and each unit is required to have at least 2 bedrooms (in some circumstances) or 3 bedrooms;

- For-Rent: 5% of all units must be affordable to very low-income households (50% AMI or below), and 5% must be affordable to lower-income households (80% AMI or below); and
- Covenants must be recorded for the projects to preserve the affordability of these units for at least 20 years.

However, the Ordinance (and therefore the in-lieu fees) do not apply to the following:

- Projects in areas subject to specific plans that require a project to provide as many or more affordable units for lower and very low-income households as the Ordinances.

The current Policy (as described in Ordinance 2721) allows developers to pay an in-lieu Affordable Housing Payment instead of developing affordable units as part of a project or as part of an offsite project. The existing fee amount for ownership units is one percent (1%) of the sales price of each market-rate unit in increments of \$50,000 with a minimum of \$5,000 for each unit. The payment amount for rental units is \$7,735 for each market-rate unit.

Legal Framework

In 2009, the Court of Appeals struck down a City of Los Angeles ordinance imposing inclusionary housing requirements on rental housing projects with a density of more than 10 dwelling units per lot. The Courts' decision that regulating the rent levels to ensure the units were affordable in nature directly violated the provisions of the Costa-Hawkins Act. Jurisdictions were unable to require affordable housing units at affordable rental rates as a condition of project approval because of this decision.

In 2015, the California Supreme Court ruled in favor of the City of San Jose in a court case involving the California Building Industry Association (Association). The Association challenged the legality of San Jose's inclusionary program on the basis that it constituted an "exaction" that required a nexus study. The court deemed that San Jose's inclusionary program was not an exaction and it constituted a valid exercise of the City's power to regulate land use.

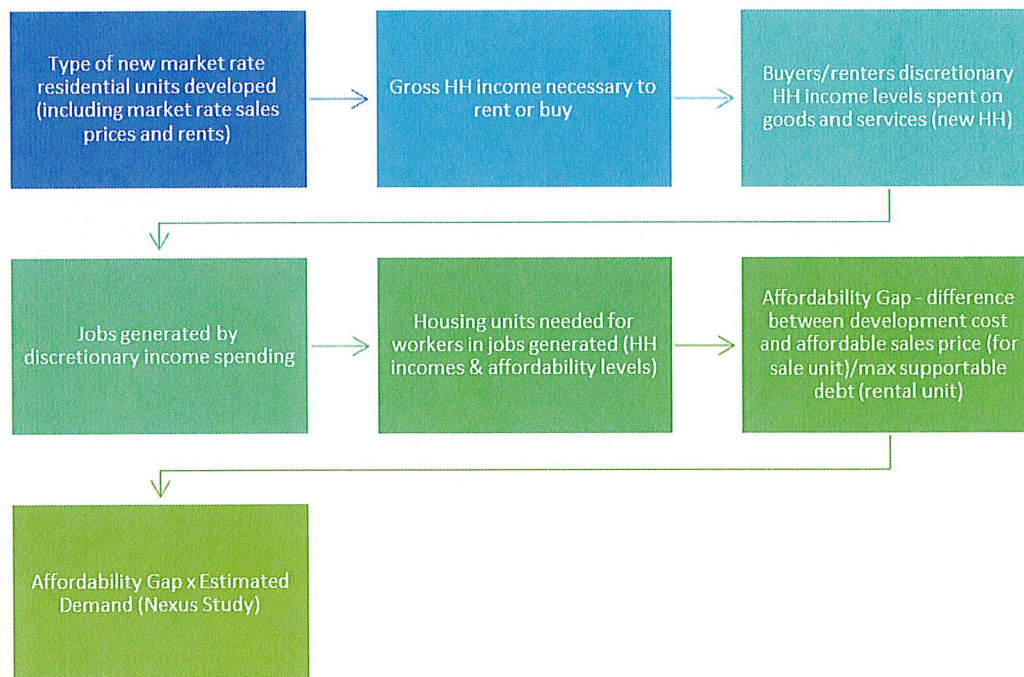
Finally, in 2017, Governor Jerry Brown signed a package of housing related bills, which included AB 1505, commonly referred to as the "Palmer Fix". AB 1505 allows jurisdictions to adopt ordinances that require a percentage of residential rental units to be affordable to individuals whose income falls below the moderate-income level for the jurisdiction. Additionally, AB 1505 requires jurisdictions to provide alternative methods for developers to satisfy their affordable housing requirements, which may include in-lieu fees, off-site construction, land dedication, or acquisition and rehabilitation of existing units.

METHODOLOGY

Nexus Analysis

Residential development projects contribute to population growth. As the population grows, additional services and facilities are needed to accommodate the residential population influx. In order to meet the increased demands of population growth, new non-residential development will occur, correlating to an increase in the worker population. A portion of the new worker population will earn a wage that is not sufficient to rent or purchase market-rate housing. The Study analyzes the maximum supported Fee to address the affordable housing need created by new residential development. The Fee will be used to build affordable housing to address the demand generated.

The methodology utilized in this nexus analysis for the Demand-Based maximum supportable Fees complies with general best practices related to nexus studies and follows the following order, specific data points are explained in the following sections of this study:



This nexus analysis is broken down into the steps described below.

Step 1: Determine the type of units to be developed

Harris & Associates coordinated with City staff, local real estate professionals, and a sampling of planned and current recently developed housing types to determine the likely characteristics of new residential units developed in the City and categorized the development into three land use types:

- Single-family units represent for-sale, detached homes.

- Multifamily attached for-sale units.
- Multifamily attached for-rent units.

Using separate housing types ensures the presentation of an accurate representation of similar market-rate units.

Step 2: Estimate the income levels of buyers and tenants of market-rate units.

The sales price and rent costs for market-rate units, as well as the income levels of potential buyers and tenants were determined using several data sources. For rental units, the income level required to occupy market-rate units is determined by taking the average annual rent for a variety of rental housing apartment sizes (studio to three bedroom) and adding the annual utility amounts, as recommended by the US Department of Housing and Urban Development (HUD), to determine the total annual cost. The annual housing cost is divided by 30%, the recommended maximum percentage of gross income to be spent on housing costs, to determine the amount of household income that would be required in order to rent a unit of that size. Table 1 details the calculations for the income levels necessary to occupy market-rate rental units. The average household income needed to rent a two or three bedroom MFR unit is estimated at \$102,740.

Table 1: Housing Income Requirements – For-Rent Market-rate Units

| | Studio | 1 Bedroom | 2 Bedroom | 3 Bedroom |
|---|-----------------|------------------|------------------|------------------|
| Average Monthly Rent ¹ | \$1,502 | \$1,621 | \$2,028 | \$2,652 |
| Monthly Utility Deduction | 181 | 181 | 181 | 276 |
| Annual Housing Costs | 20,196 | 21,624 | 26,508 | 35,136 |
| Percent of Income Spent on Rent | 30% | 30% | 30% | 30% |
| Annual Household Income Required | \$67,320 | \$72,080 | \$88,360 | \$117,120 |

1) July 2019 Ventura County Apartment Market Survey, Dyer Sheehan Group

With for-sale units, the calculation for the income level requirement to purchase a market-rate unit accounts for a five percent (5%) down payment to determine the mortgage amount and then applying the current mortgage insurance rates, homeowner's insurance, estimated property tax payments, and home owner's association (HOA) fees to determine the total monthly housing costs. Finally, dividing the total monthly obligation by the maximum 35 percent (35%) of gross income, as recommended by HUD. Table 2 details the calculations of the income levels required to purchase for-sale market-rate units.

Table 2: Housing Income Requirements – For-Sale Market-rate Units

| | For-Sale SFR | For-Sale MFR |
|--|------------------|------------------|
| Market Sales Price ¹ | \$725,000 | \$599,000 |
| Down Payment (5%) | 36,250 | 29,950 |
| Amount Borrowed | 688,750 | 569,050 |
| Estimated Mortgage Payment ² | \$3,911 | \$3,231 |
| Mortgage Insurance (0.90%) ³ | 517 | 427 |
| Homeowners Insurance (0.25%) ⁴ | 151 | 125 |
| Property Tax (1.22%) ⁵ | 740 | 611 |
| HOA ¹ | 50 | 250 |
| Total Monthly Housing Cost | \$5,369 | \$4,644 |
| Share of Income Spent on Mortgage ³ | 35% | 35% |
| Annual Household Income Required | \$184,080 | \$159,223 |

1) MLS Survey completed January 2020 for non-coastal properties constructed and sold in the last 3 years, rounded

2) Assumes 5.5% interest rate and a 30-year amortization

3) U.S. Department of Housing and Urban development

4) Per City of Oxnard Housing Department

5) Oxnard CAFR average tax rate

Step 3: Calculate Jobs Generated

IMPLAN is an industry standard economic impact analysis tool that uses data aggregated from various data sources to allocate the spending patterns of individuals from different income groups. This spending data is used to estimate the new jobs created from spending by new households. Table 2 summarizes the estimated household income data for the unit types detailed in Step 1.

The information from Table 2 and the average household income needed from Table 1 to rent a two or three bedroom MFR unit (\$102,740) were used as inputs to IMPLAN to estimate the number of jobs created to serve new development. IMPLAN further categorizes these new workers based on their occupation and their estimated wages. Table 3 is a summary of the output data from IMPLAN. The full IMPLAN dataset is available in Attachment 1.

Table 3: Jobs Generated per Market-rate Unit

| | For-Sale SFR Unit | For-Sale MFR Unit | For-Rent MFR Unit |
|------------------------------------|----------------------|----------------------|----------------------|
| Very Low Income (0-50% AMI) | 0.123 | 0.096 | 0.073 |
| Low Income (50-80% AMI) | 0.232 | 0.152 | 0.115 |
| Moderate Income Jobs (80-120% AMI) | 0.276 | 0.203 | 0.154 |
| Jobs over 120% AMI | 0.354 | 0.283 | 0.214 |
| Total Jobs Created | 0.985 | 0.734 | 0.556 |

Source: IMPLAN 2019. See Attachment 1 for detailed information.

Step 4: Determine the number of new worker households and their annual income

Calculating the Fee based on the addition of new permanent employment is not done on an individual jobs basis, as it is typical for households in the City to have more than one wage earner per household. The calculation of the total number of new worker households divides the induced worker output from the IMPLAN analysis by the average number of workers per household as determined by the U.S. Census Bureau American Community Survey and the Housing Element (1.87 workers/household). The resultant households attributed to the housing categories determined in Step 1 and are outlined in Table 4.

Table 4: Households Generated per Market-rate Unit

| | For-Sale SFR Unit | For-Sale MFR Unit | For-Rent MFR Unit |
|------------------------------------|----------------------|----------------------|----------------------|
| Very Low Income (0-50% AMI) | 0.066 | 0.051 | 0.039 |
| Low Income (50-80% AMI) | 0.124 | 0.081 | 0.061 |
| Moderate Income Jobs (80-120% AMI) | 0.148 | 0.109 | 0.082 |
| Jobs over 120% AMI | 0.189 | 0.151 | 0.114 |
| Total Households Generated | 0.527 | 0.392 | 0.296 |

Source: IMPLAN 2019. See Attachment 1 for detailed information.

Based on 1.87 jobs per household.

Step 5: Calculate the demand for affordable units for new worker households

Based on the calculation of new worker household income, the worker households are categorized by target income group (very low income, low income, moderate income). Worker households with above-moderate incomes are removed from this nexus analysis, because they would not require affordable housing.

Step 6: Calculate the affordability gap per unit between development costs and sales price/rental income

The affordability gap is calculated by comparing the amount the workers within the low income and very low income can pay for housing versus the total cost of developing a residential unit (the amount of subsidy needed to fill the “gap”). Section 2 provides a detailed explanation of this calculation.

Step 7: Calculate the maximum supported Fee for the type of units analyzed

The maximum supported Fee calculation for each housing type included in the nexus study is derived by multiplying the total number of households requiring affordable housing (Step 5) by the average affordability gap per household (Step 6). The maximum supported Fee pursuant to the requirements in the City’s current Inclusionary Housing Ordinance (i.e., the percentage of affordable units required to be produced) is also calculated and provided in Section 3.

Section 2 AFFORDABILITY GAP ANALYSIS

A key input required in the calculation of the maximum supported in-lieu Fees is the affordability gap. The affordability gap provides information on the difference between what lower-income buyers and renters can afford to pay versus the total cost of developing the units. This section summarizes the methodology used to calculate the affordability gap and presents the results of this analysis for the respective unit type. The affordability gap calculations in this section are the same for both the Demand-Based and Inclusionary Equivalent Fee methodologies.

METHODOLOGY

The following section details the findings for affordable housing rates, total development costs of units in the City, and a summary of the affordability gap by unit type.

AFFORDABLE HOUSING RATES

Prior to determining the affordability gap, the total amount that households can afford to allocate to their housing must be determined. For the purposes of this report, the income levels included in the City's Inclusionary Housing Ordinance have been included in the analysis and are defined as:

1. Very Low Income (Between 0 and 50% of AMI)
2. Low Income (Between 50 and 80% of AMI)

For the demand based Fee, the Moderate Income Level (80-120% of AMI) is also used.

Housing affordability for rental units is defined by HUD as 30% of gross income. Table 5 shows the maximum affordable rent attributed to each income level.

Table 5: Maximum Affordable Rent by Income Level

| | Very low Income (0-50% AMI) | Low Income (50-80% AMI) | Moderate Income (80-120% AMI) |
|---|--------------------------------|----------------------------|----------------------------------|
| Maximum Household Income ¹ | \$52,300 | \$83,700 | \$117,350 |
| Maximum Monthly Housing Cost ² | 1,308 | 2,093 | 2,934 |

¹ Household AMI is shown for a family of four

² 30% of gross monthly income per HUD guidelines

The recommended household gross income expenditure for ownership housing units pursuant to HUD is 35% of gross income minus a deduction for typical homeownership costs, such as insurances, taxes, utilities, and fees. Table 6 shows the maximum affordable mortgage for a low-income household of four persons.

It is important to note that only low-income and moderate income households are included in this portion of the analysis due to several factors including the affordability requirements in the City's

existing Inclusionary Housing Ordinance (that references only very low and low-income households), the tightening of lending requirements and the elimination of redevelopment agencies in 2011. Under current programs and very limited funding sources, it is generally not financially feasible to develop for-sale housing units for very low-income households. Prior to 2011, redevelopment provided a significant funding source to cities to assist homebuyers with loan qualification and down payment assistant at lower income levels. Additionally, lending practices after the housing crash in 2008 have been reformed, making it more difficult for individuals to obtain loans. These events have affected lower-income households significantly, making ownership very challenging. The following analysis includes a deduction for utilities to follow HUD guidelines.

Table 6: Maximum Affordable Mortgage by Income Level

| | Low Income SFR (50-80% AMI) | Low Income MFR (50-80% AMI) | Moderate Income SFR (80-120% AMI) | Moderate Income MFR (80-120% AMI) |
|--|--|--|--|--|
| Household Income ¹ | \$83,700 | \$83,700 | \$117,350 | \$117,350 |
| Maximum Monthly Housing Cost ² | 2,441 | 2,441 | 3,423 | 3,423 |
| <i>Less:</i> | | | | |
| Utility Deduction | \$276 | \$181 | \$276 | \$181 |
| Mortgage Insurance (0.90%) ³ | 206 | 197 | 309 | 300 |
| Homeowner's Insurance (0.25%) ³ | 148 | 129 | 148 | 129 |
| Property Tax (1.22%) ⁴ | 279 | 267 | 419 | 406 |
| HOA ⁵ | 50 | 250 | 50 | 250 |
| Maximum Monthly Mortgage | \$1,482 | \$1,417 | \$2,221 | \$2,157 |
| Maximum Mortgage Amount | \$261,012 | \$249,565 | \$391,166 | \$379,895 |

1) Table ES.2 for a family of 4

2) 35% of gross income per U.S. Department of Housing and Urban Development

3) Per City of Oxnard Housing Department

4) Oxnard CAFR average tax rate

5) MLS survey completed January 2020, rounded

DEVELOPMENT COSTS

Next, the estimated cost of developing affordable housing units was determined by examining current development trends related to unit type and size. As the development, sale, and operations associated with for-rent and for-sale units vary, an analysis of each housing type was required.

For the purposes of this Study, the development costs for rental housing were based on the Turner Center for Housing Innovation at the University of California, Berkeley study entitled “Making It Pencil: The Math Behind Housing Development” (Turner Center Study) as well as recently completed market-rate and affordable multifamily projects in the City.

The costs associated with the cost for acquisition of land are from a CoStar survey of vacant land transactions completed January 2020 while the development costs were provided by local developers and are representative of multifamily units recently completed within the City.

Table 7 shows the total development cost of multifamily for-rent two and three-bedroom units, pursuant to the requirements in the City's existing Inclusionary Housing Ordinance. Two-bedroom multifamily units are assumed to be 950 square feet and three-bedroom units are assumed to be 1,025 square feet.

Table 7: Development Costs – Affordable Multifamily For-Rent

| | | |
|---|---------------------------------------|------------------|
| Assumed Density | A | 39 Units/Acre |
| Land Acquisition Cost (\$/Acre) ¹ | B | \$728,000 |
| Land Price per Unit | $B \div A = C$ | 18,667 |
| Land Price per Unit SF | $C \div \text{Average Unit Size}^2$ | 18.90 |
| Development Costs ³ | | |
| Land Cost (\$/Rentable SF) | | \$18.90 |
| Building Hard Costs (\$/SF) | D | 200.00 |
| Prevailing Wage Cost Increase (35%) | $D \times 0.35 = E$ | 70.00 |
| Soft Costs (30%) ⁴ | $D \times 0.30 = F$ | 60.00 |
| Developer Fees (12%) | $(D + E + F) \times 0.12$ | 39.60 |
| Financing Costs (10%) | $(D + E + F) \times 0.10$ | 33.00 |
| Total Development Costs per SF | | \$421.50 |
| Rental Unit Development Cost | Average Unit Size ⁵ | |
| 2 Bedroom Unit | 950 | \$400,425 |
| 3 Bedroom Unit | 1,025 | \$432,038 |
| Average Development Cost of 2 and 3 Bedroom Unit | | \$416,231 |

1) Per Vacant Land Report from CoStar, January 2020.

2) Average square footage is 988 square feet.

3) "Making It Pencil: The Math Behind Housing Development." Aug. 2019, www.TernerCenter.Berkeley.Edu.

4) Includes design, engineering, city permits and fees, and contingencies.

5) Square footages based on recently completed affordable projects.

Table 8 shows the total development cost of multifamily for-sale two and three-bedroom units. Two-bedroom units are assumed to be 1,200 square feet and three-bedroom units are assumed to be 1,750 square feet.

Table 8: Development Costs – Affordable Multifamily For-Sale

| | | |
|---|---------------------------------------|------------------|
| Assumed Density | A | 30 Units/Acre |
| Land Acquisition Cost (\$/Acre) ¹ | B | \$728,000 |
| Land Price per Unit | $B \div A = C$ | 24,267 |
| Land Price per Unit SF | $C \div \text{Average Unit Size}^2$ | 16.45 |
| Development Costs ² | | |
| Land Cost (\$/Rentable SF) | | \$16.45 |
| Building Hard Costs (\$/SF) | D | 200.00 |
| Prevailing Wage Cost Increase (35%) | $D \times 0.35 = E$ | 70.00 |
| Soft Costs (30%) ³ | $D \times 0.30 = F$ | 60.00 |
| Developer Fees (12%) | $(D + E + F) \times 0.12$ | 39.60 |
| Financing Costs (10%) | $(D + E + F) \times 0.10$ | 33.00 |
| Total Development Costs per SF | | \$419.05 |
| For-Sale Unit Development Cost | Average Unit Size ⁵ | |
| 2 Bedroom Unit | 1,200 | \$502,860 |
| 3 Bedroom Unit | 1,750 | \$733,338 |
| Average Development Cost of 2 and 3 Bedroom Unit | | \$618,099 |

1) Per Vacant Land Report from CoStar, January 2020.

2) Average square footage is 1,475 square feet.

3) "Making It Pencil: The Math Behind Housing Development." Aug. 2019, www.TernerCenter.Berkeley.Edu.

4) Includes design, engineering, city permits and fees, and contingencies.

5) Square footages based on recently sold multifamily properties.

Table 9 shows the total development cost per for-sale unit. For-sale units are assumed to be 1,500 square foot, single-family homes, consisting of 3 bedrooms and 2.5 bathrooms. The costs associated with the development of these units were obtained from the Turner Center Study and local developers and are representative of recently completed units within the City.

Table 9: Development Costs – Affordable Single-Family

| | | |
|--|------------------------------|--|
| Land Costs | | |
| Land Acquisition Cost per Acre ¹ | | \$728,000 |
| Land Cost per Unit (8 Units/Acre) | | 91,000 |
| Site Improvement (15%) | | 13,650 |
| Finished Lot Cost | | \$104,650 |
| Construction Costs ² | <i>Estimated Cost per SF</i> | <i>Total Building Costs ³</i> |
| Direct Costs | \$200.00 | \$300,000 |
| Prevailing Wage Cost Increase (35%) | 70.00 | 105,000 |
| Soft Costs (20%) ⁴ | 54.00 | 81,000 |
| Developer Fees (12%) | 38.88 | 58,320 |
| Financing Costs (10%) | 39.38 | 59,065 |
| Total Construction Cost | \$402.26 | \$603,385 |
| Total Building Cost for 1,500 square foot affordable unit | | \$708,035 |

1) Per Vacant Land Report from CoStar, January 2020.

2) "Making It Pencil: The Math Behind Housing Development." Aug. 2019, www.TurnerCenter.Berkeley.Edu

3) Construction assumed to be a single family 1,500 SF, 3 bedroom, 2.5 bathroom

4) Includes design, engineering, city permits and fees, and contingencies.

AFFORDABILITY GAP RESULTS

The differences between the total amount that each targeted income level can afford to allocate for housing (Table 5, Table 6) and the total cost of developing new units (Table 7, Table 8, Table 9) determines the Affordability Gap. This difference represents the fee amount that is necessary to cover the costs of developing housing at each of the respective income levels analyzed. While other funding sources may be available to assist in mitigating this difference between affordability and development costs, these sources are very difficult to predict with accuracy moving forward.

In the case of for-sale housing, there are very few funding sources for subsidy on this unit type in the wake of redevelopment dissolution in 2011 which eliminated approximately \$1 billion of low and moderate-income housing revenue Statewide. Lending practices have become stricter in the years following the 2008 recession and qualifying households below 80% AMI for a mortgage is extremely challenging, even with the City's current down payment assistance program.

The City's current Ordinance calls for 10% of all newly developed for-sale units to be affordable to very low and low-income households (i.e., below 80% of AMI). Therefore, the inclusionary equivalent gap analysis for ownership units has been limited to the low-income category for the purposes of this analysis. Table 10 shows the for-sale affordability gap calculation for low and moderate income households.

Table 10: Affordability Gap –For-Sale Units

| | Maximum Mortgage Amount ¹ | Development Costs ² | Affordability Gap |
|--|---|--------------------------------|-------------------|
| Low Income Single Family (80% AMI) | \$261,012 | \$708,035 | \$447,023 |
| Low Income Multifamily (80% AMI) | 249,565 | 618,099 | 368,534 |
| Moderate Income Single Family (120% AMI) | 391,166 | 708,035 | 316,869 |
| Moderate Income Multifamily (120% AMI) | 379,895 | 618,099 | 238,204 |

1) Table 6

2) Tables 8 and 9

The affordability gap for rental units is the difference between the development and the maximum supported debt for each income level, shown in Table 11. The moderate income households are used only for the demand based fee calculation.

Table 11: Affordability Gap – For-Rent Units

| | Very Low Income (0-50% AMI) | Low Income (50-80% AMI) | Moderate Income (80-120% AMI) |
|---|--------------------------------|----------------------------|----------------------------------|
| Maximum Available for Rent ¹ | \$1,308 | \$2,093 | \$2,934 |
| Annual Gross Rental Income ² | 15,696 | 25,116 | 35,208 |
| Estimated Annual Expenses ³ | 8,285 | 8,756 | 9,260 |
| Net Operating Income | 7,411 | 16,360 | 25,948 |
| Available for Debt Service ⁴ | 5,929 | 13,088 | 20,758 |
| Supportable Debt ⁵ | 82,408 | 181,916 | 288,523 |
| Development Costs ⁶ | 416,231 | 416,231 | 416,231 |
| Affordability Gap | \$333,823 | \$234,315 | \$127,708 |

1) Table 5: Maximum Affordable For-Rent by Income Level

2) Available rent multiplied by 12

3) Assumes 5% for vacancy/collection loss and \$7,500 annual maintenance/capital improvement costs.

4) Assumes 1.25 Debt Coverage Ratio

5) Assumes a 6% interest rate and 30-year loan term

6) Table 7: Development Costs - Affordable Multifamily For-Rent

Section 3 FINDINGS AND NEXUS REQUIREMENTS

This section presents the maximum supported fee per market-rate unit, which is calculated by following the methodology outlined in Section 1 and using the results from the affordability gap analysis detailed in Section 2.

MAXIMUM FEE CALCULATION

The maximum supported Fees has been calculated in two different ways. Both calculations incorporate the affordability gap by unit type and income level. The first way of calculating the fee (the Demand-Based Method) consists of multiplying the affordability gap per unit by the number of affordable units needed by income level. The second way to calculate Fees (Inclusionary Equivalent Fee) is by multiplying the affordability gap by unit type and at affordability levels required by the City's Inclusionary Housing Ordinance. Table 12 shows the average affordability gap by income group.

Table 12: Average Affordability Gap

| | For Sale SFR Affordability Gap ¹ | For Sale MFR Affordability Gap ¹ | For Rent MFR Affordability Gap ¹ | Average Affordability Gap |
|-------------------------------|--|--|--|------------------------------|
| Very Low Income (0-50% AMI) | n/a | n/a | \$333,823 | \$333,823 |
| Low Income (50-80% AMI) | 447,023 | 368,534 | 234,315 | 349,957 |
| Moderate Income (80-120% AMI) | 316,869 | 238,204 | 127,708 | 227,594 |

1) Tables 10 and 11

Table 13 shows the maximum supported Fees for a single residential unit under the Demand-Based Method. This is calculated by taking the number of affordable households generated at each income level times the average affordability gap at that income level.

Table 13: Maximum Supported Demand-Based Affordable Housing In-Lieu Fee, Single-Family

| | Affordable Households Generated ¹ | Average Affordability Gap ² | Affordable Gap per Unit |
|-------------------------------|--|--|----------------------------|
| Very Low Income (0-50% AMI) | 0.066 | \$333,823 | \$22,032 |
| Low Income (50-80% AMI) | 0.124 | 349,957 | 43,395 |
| Moderate Income (80-120% AMI) | 0.148 | 227,594 | 33,684 |
| Total | 0.338 | | \$99,111 |

1) Table 4

2) Table 12

Table 14 provides the estimated Fees under the Demand-Based Method for multi-family for-sale units.

Table 14: Maximum Supported Demand-Based Affordable Housing In-Lieu Fee, For-Sale Multifamily

| | Affordable Households Generated ¹ | Average Affordability Gap ² | Affordable Gap per Unit |
|-------------------------------|--|--|----------------------------|
| Very Low Income (0-50% AMI) | 0.051 | \$333,823 | \$17,025 |
| Low Income (50-80% AMI) | 0.081 | 349,957 | 28,347 |
| Moderate Income (80-120% AMI) | 0.109 | 227,594 | 24,808 |
| Total | 0.241 | | \$70,180 |

1) Table 4

2) Table 12

Table 15 provides the estimated Fees under the Demand-Based Method for multi-family rental units.

Table 15: Maximum Supported Demand-Based Affordable Housing In-Lieu Fee, For-Rent Multifamily

| | Affordable Households Generated ¹ | Average Affordability Gap ² | Affordable Gap per Unit |
|-------------------------------|--|--|----------------------------|
| Very Low Income (0-50% AMI) | 0.039 | \$333,823 | \$13,019 |
| Low Income (50-80% AMI) | 0.061 | 349,957 | 21,347 |
| Moderate Income (80-120% AMI) | 0.082 | 227,594 | 18,663 |
| Total | 0.182 | | \$53,029 |

1) Table 4

2) Table 12

Tables 16 and 17 provide estimated maximum supported Fees using the requirements on the total percentage of affordable units (both for-sale and rental) that must be developed as part of market rate housing projects as stated in the City's existing Inclusionary Housing Ordinance.

Table 16: Maximum Supported Inclusionary Equivalent Fee, For-Sale Units

| | Low Income (50-80% AMI) Single Family For-Sale | Low Income (50-80% AMI) Multifamily For-Sale |
|---------------------------------------|---|---|
| Maximum Affordable Price ¹ | \$261,000 | \$250,000 |
| Development Cost ² | 708,000 | 618,000 |
| Affordable Gap | \$447,000 | \$368,000 |
| Inclusionary 10% Requirement | \$44,700 | \$36,800 |

1) Table 6, rounded

2) Tables 8 and 9, rounded

Table 17: Maximum Supported Inclusionary Equivalent Fee, For-Rent Multifamily

| | Very Low Income (0-50% AMI) Multifamily For-Rent | Low Income (50-80% AMI) Multifamily For-Rent |
|---------------------------------------|---|---|
| Maximum Supportable Debt ¹ | \$82,000 | \$182,000 |
| Development Costs ² | 416,000 | 416,000 |
| Affordable Gap | \$334,000 | \$234,000 |
| Inclusionary 5% Requirement | \$16,700 | \$11,700 |
| Total For-Rent Fee | | \$28,400 |

1) Table 11, rounded

2) Table 7, rounded

Table 18 provides a comparison of Fees calculated under the current Inclusionary Housing Ordinance (including the fees contained in the Ordinance), the estimated fees under the nexus analysis (utilizing the IMPLAN model to project demand of affordable units resulting from market rate residential development), and the estimated fees under the existing Inclusionary Housing Ordinance but analyzing the affordable gap to determine Fees (rather than the existing fee calculation contained in the Ordinance).

Table 18: Maximum Supportable Fees

| | Existing In-Lieu Fee¹ | Demand Based Supportable Fee² | Inclusionary Equivalent Supportable Fee |
|-------------------------------|---|---|--|
| Single-Family For-Sale | \$7,000 | \$99,111 | \$44,700 |
| Multifamily For-Sale | 5,500 | 70,180 | 36,800 |
| Multifamily For-Rent | 7,735 | 53,029 | 28,400 |

1) Using the median sales price estimate from January 2020 Multiple Listing Service (MLS) survey, for-rent fee per July 15, 2019 fee update

Section 4 POLICY CONSIDERATIONS

Adopting a fee to be collected from new development should be consistent with other City policies and should not have measurable impacts on the development community. Harris and City staff evaluated multiple scenarios and present the following for consideration.

HOUSING POLICY CONSISTENCY

The City adopted its 2013-2021 Mid-Cycle Housing Element (housing element) in October 2017. The Housing Element identified that approximately five percent (5%) of lower-income households have housing issues, such as incomplete kitchen or plumbing facilities, or were overpaying for adequate housing. Adopting an affordable housing impact fee enables the City to mitigate these issues for future development by providing lower-income households the ability to afford adequate housing.

The City has historically utilized an Inclusionary Housing Policy originally established by Ordinance No. 2615 (adopted in 1999) and most recently amended by Ordinance No. 2721 (adopted in 2006) to generate affordable housing in proportion with the overall increase in market-rate residential units and is described in the Housing Element of the City's General Plan. The Policy required the following for housing projects with 10 or more units:

- For-Sale: 10% of all units must be affordable to lower-income households and each unit is required to have at least 2 bedrooms (in some circumstances) or 3 bedrooms;
- For-Rent: 5% of all units must be affordable to very low-income households (50% AMI or below), and 5% must be affordable to lower-income households (80% AMI or below); and
- Covenants must be recorded for the projects to preserve the affordability of these units for at least 20 years.

However, the Ordinance (and therefore the in-lieu fees) do not apply to the following:

- Projects in areas subject to specific plans that require project to provide as many or more affordable units for lower and very low-income households as the Ordinances

The current Policy (as described in Ordinance 2715) allows developers to pay an in-lieu Affordable Housing Payment instead of developing affordable units as part of a project or as part of an offsite project. The existing Payment amount for ownership units is one percent (1%) of the sales price of each market-rate unit in increments of \$50,000 with a minimum of \$5,000 for each unit. The Payment amount for rental units is \$4,590 for each market-rate unit (increased annually after 2006 by the Consumer Price Index). The fee is currently \$7,735.

COMPARISON TO OTHER JURISDICTIONS

Jurisdictions throughout the State of California have adopted an affordable housing fee program as a method of bridging the housing affordability gap. Harris & Associates has compiled a list of fees from nearby cities that have adopted comparable affordable housing fees. Table 19 summarizes the aggregated fees of the jurisdictions.

Table 19: Affordable Housing Fee Market Survey

| Municipality | Single Family For-Sale | Multifamily For-Sale | Multifamily For-Rent |
|--------------------------------|-----------------------------------|---------------------------------|---------------------------------|
| Oxnard (Proposed) | \$36,000 | \$35,000 | \$28,000 |
| Oxnard (Existing) | 7,000 | 5,500 | 7,735 |
| Agoura Hills | 71,190 | 35,029 | 34,002 |
| Calabasas | 37,500 | 36,875 | 18,772 |
| Huntington Beach | 29,640 | 29,640 | 29,640 |
| Oceanside | 11,735 | 11,558 | 8,105 |
| Pasadena (10-49 Units) | 44,625 | 43,881 | 18,110 |
| Pasadena (50+ Units) | 61,924 | 60,892 | 24,868 |
| San Diego | 16,230 | 15,960 | 10,690 |
| San Luis Obispo County | 5,625 | 5,625 | 3,375 |
| Santa Barbara (10+ Units) | 55,482 | 55,482 | 48,954 |
| Santa Barbara (2-9 Units) | 18,493 | 18,493 | 16,317 |
| Santa Monica | n/a | 62,865 | 36,052 |
| West Hollywood | 43,845 | 43,114 | 28,879 |
| Comparable City Average | \$36,026 | \$34,951 | \$23,147 |

CONCLUSION

Table 20 below provides a summary of all fees calculated as part of this study.

Table 20: Maximum Supported Fee Comparison

| | Existing In- Lieu Fee¹ | Demand Based Supportable Fee² | Inclusionary Equivalent Supportable Fee³ | Local City Survey⁴ |
|-------------------------------|--|---|--|--|
| Single-Family For-Sale | \$7,000 | \$99,111 | \$44,700 | \$36,026 |
| Multifamily For-Sale | 5,500 | 70,180 | 36,800 | 34,951 |
| Multifamily For-Rent | 7,735 | 53,029 | 28,400 | 23,147 |

1) Using the median sales price estimate from January 2020 Multiple Listing Service (MLS) survey, for-rent fee per January 2020 fee update.

2) Tables 13, 14, 15.

3) Tables 16 and 17.

4) Table 19.

The City has the discretion to adopt fees that are lower than the maximum supported fees under the Demand-Based and Inclusionary Equivalent levels. It is clear that the high development costs have resulted in significantly higher costs to develop affordable housing. Due to the housing legislation and mandates from the State to cities to encourage the development of housing at all

income levels, it is important to note residential development could potentially decrease and occur in other jurisdictions with lower fees. This would potentially result in decreased housing development in the City. One option available to the City is to adopt Fees that are consistent with the average of the fees collected in other jurisdictions (in the column titled Local City Survey) in order to ensure that housing development continues at its current pace.

PROPOSED FEES

City staff reviewed the options provided in this analysis and is recommending the following fees be adopted. These fees fall below the maximum supportable fees calculated in this report and were determined based on an analysis of other local agencies. The maximum fee based on the City's existing ordinance was deemed higher than the market would bear for single family and multifamily for-sale units. Staff recommends lowering the fees to an amount more in line with competitive cities for the single family and multifamily for-sale units but setting the fee for for-rent units closer to the actual cost to develop a multi-family project. This methodology supports the City's goal of using the in-lieu fee funds to build multifamily for rent projects. See Table ES.4 for a summary of the recommended fees.

Table 21: Proposed Fees

| Land Use | Inclusionary Requirement | Affordability Level | Affordability Gap per Unit | Fee per Unit | Total Fee per Unit | Average of Other Cities | Proposed Fee |
|---------------------------------|--------------------------|---------------------|----------------------------|--------------|--------------------|-------------------------|--------------|
| Single Family Detached For-Sale | 10% | 80% AMI or below | \$447,023 | \$44,702 | \$44,702 | \$36,026 | \$36,000 |
| Multifamily For-Sale | 10% | 80% AMI or below | 368,534 | 36,853 | 36,853 | 34,951 | 35,000 |
| Multifamily For-Rent | 5% | 50-80% AMI | 234,315 | 11,716 | 28,407 | 23,147 | 28,000 |
| | 5% | 50% AMI or below | 333,823 | 16,691 | | | |

Appendix A: IMPLAN Output

Appendix A
Induced Employment per New Unit

| Impact Industry | Income per Job | SFR Jobs Generated | For-Sale MFR Jobs Generated | For-Rent MFR Jobs Generated |
|---|-----------------------|---------------------------|------------------------------------|------------------------------------|
| 10 - All other crop farming | \$ 47,144.69 | 0.00000491713 | 0.00000335834 | 0.00000254377 |
| 101 - Coffee and tea manufacturing | \$ 228,442.45 | 0.00000032927 | 0.00000025789 | 0.00000019534 |
| 102 - Flavoring syrup and concentrate manufacturing | \$ 925,559.53 | 0.00000046297 | 0.00000033940 | 0.00000025708 |
| 103 - Mayonnalse, dressing, and sauce manufacturing | \$ 85,985.89 | 0.00000017998 | 0.00000014177 | 0.00000010739 |
| 104 - Spice and extract manufacturing | \$ 139,538.64 | 0.00000259475 | 0.00000204787 | 0.00000155116 |
| 105 - All other food manufacturing | \$ 113,889.89 | 0.00001570009 | 0.00001243046 | 0.00000941544 |
| 106 - Bottled and canned soft drinks & water | \$ 159,248.46 | 0.00001136477 | 0.00000994207 | 0.00000684891 |
| 107 - Manufactured ice | \$ 1,016,280.32 | 0.00000011225 | 0.00000008931 | 0.00000006765 |
| 108 - Breweries | \$ 360,435.38 | 0.00001078887 | 0.00000706565 | 0.00000535187 |
| 109 - Wineries | \$ 243,422.39 | 0.00000601301 | 0.00000397018 | 0.00000300720 |
| 110 - Distilleries | \$ 2,096,314.21 | 0.00000002529 | 0.00000001687 | 0.00000001278 |
| 119 - Carpet and rug mills | \$ 86,042.95 | 0.00000244658 | 0.00000155822 | 0.00000118027 |
| 121 - Textile bag and canvas mills | \$ 38,929.06 | 0.00000058550 | 0.00000037611 | 0.00000028488 |
| 123 - Other textile product mills | \$ 43,711.51 | 0.00000145641 | 0.00000092489 | 0.00000070056 |
| 125 - Other apparel knitting mills | \$ 145,174.28 | 0.00000020761 | 0.00000013338 | 0.00000010103 |
| 126 - Cut and sew apparel contractors | \$ 133,653.33 | 0.00000044879 | 0.00000032636 | 0.00000024720 |
| 127 - Men's and boys' cut and sew apparel manufacturing | \$ 133,216.91 | 0.00000279856 | 0.00000178061 | 0.00000134872 |
| 128 - Women's and girls' cut and sew apparel manufacturing | \$ 196,018.39 | 0.00000063252 | 0.00000040184 | 0.00000030437 |
| 129 - Other cut and sew apparel manufacturing | \$ 173,739.18 | 0.00000127874 | 0.00000081409 | 0.00000061663 |
| 130 - Apparel accessories and other apparel manufacturing | \$ 338,270.71 | 0.00000009085 | 0.00000005801 | 0.00000004394 |
| 137 - Engineered wood member and truss manufacturing | \$ 71,795.00 | 0.00000166716 | 0.00000123883 | 0.00000093835 |
| 138 - Reconstituted wood product manufacturing | \$ 199,548.98 | 0.00000226806 | 0.00000168501 | 0.00000127631 |
| 139 - Wood windows and door manufacturing | \$ 75,212.06 | 0.00000129698 | 0.00000095046 | 0.00000071993 |
| 14 - Animal production, except cattle and poultry and eggs | \$ 308,396.63 | 0.00000032967 | 0.00000021387 | 0.00000016199 |
| 141 - Other millwork, including flooring | \$ 79,053.42 | 0.00000129464 | 0.00000095253 | 0.00000072150 |
| 142 - Wood container and pallet manufacturing | \$ 83,549.59 | 0.00000131715 | 0.00000090870 | 0.00000068829 |
| 145 - All other miscellaneous wood product manufacturing | \$ 76,243.89 | 0.00000186874 | 0.00000131750 | 0.00000099794 |
| 147 - Paper mills | \$ 243,089.09 | 0.00000092161 | 0.000000601283 | 0.00000455441 |
| 149 - Paperboard container manufacturing | \$ 116,838.78 | 0.00000517365 | 0.00000376897 | 0.00000285480 |
| 150 - Paper bag and coated and treated paper manufacturing | \$ 86,983.57 | 0.00000073943 | 0.00000051944 | 0.00000339345 |
| 151 - Stationery product manufacturing | \$ 84,102.93 | 0.00000031273 | 0.00000022299 | 0.00000016890 |
| 152 - Sanitary paper product manufacturing | \$ 348,923.61 | 0.00001029384 | 0.00000702757 | 0.00000532303 |
| 153 - All other converted paper product manufacturing | \$ 89,099.05 | 0.00000033061 | 0.00000022682 | 0.00000017180 |
| 154 - Printing | \$ 55,853.53 | 0.000090351428 | 0.0007096293 | 0.00053707889 |
| 155 - Support activities for printing | \$ 48,139.12 | 0.00000084972 | 0.00000065189 | 0.00000049378 |
| 156 - Petroleum refineries | \$ 2,741,355.01 | 0.00000334387 | 0.00000282778 | 0.00000214190 |
| 159 - Petroleum lubricating oil and grease manufacturing | \$ 895,494.40 | 0.00000016951 | 0.00000014087 | 0.00000010670 |
| 163 - Synthetic dye and pigment manufacturing | \$ 288,672.75 | 0.00000149248 | 0.00000097061 | 0.00000073518 |
| 166 - Plastics material and resin manufacturing | \$ 329,697.18 | 0.00000017325 | 0.00000012074 | 0.00000009145 |
| 169 - Nitrogenous fertilizer manufacturing | \$ 286,702.32 | 0.00000850420 | 0.00000586953 | 0.00000445887 |
| 17 - Commercial fishing | \$ 58,329.00 | 0.00009617060 | 0.00006905170 | 0.00005320313 |
| 172 - Pesticide and other agricultural chemical manufacturing | \$ 778,492.65 | 0.00004370253 | 0.00002746928 | 0.00002080657 |
| 173 - Medicinal and botanical manufacturing | \$ 235,648.60 | 0.00000071349 | 0.00000055546 | 0.00000042073 |
| 174 - Pharmaceutical preparation manufacturing | \$ 1,917,062.29 | 0.00001927374 | 0.00001578569 | 0.00001195685 |
| 175 - In-vitro diagnostic substance manufacturing | \$ 518,981.00 | 0.00000904811 | 0.00000651897 | 0.00000493779 |
| 176 - Biological product (except diagnostic) manufacturing | \$ 662,726.04 | 0.00002377268 | 0.00001788041 | 0.00001354350 |
| 177 - Paint and coating manufacturing | \$ 128,663.71 | 0.00000115114 | 0.000000084911 | 0.00000064316 |
| 178 - Adhesive manufacturing | \$ 40,943.26 | 0.00000036494 | 0.00000025796 | 0.00000019539 |
| 179 - Soap and other detergent manufacturing | \$ 526,026.98 | 0.00000507860 | 0.00000333989 | 0.00000252980 |
| 18 - Commercial hunting and trapping | \$ 211,188.20 | 0.00000029370 | 0.00000021129 | 0.00000016004 |
| 180 - Polish and other sanitation good manufacturing | \$ 159,203.34 | 0.00000203818 | 0.00000134959 | 0.00000102224 |
| 182 - Toilet preparation manufacturing | \$ 299,279.91 | 0.00002360520 | 0.00001664510 | 0.00001260781 |
| 185 - Custom compounding of purchased resins | \$ 138,319.30 | 0.00000559631 | 0.00000430608 | 0.00000326164 |
| 186 - Photographic film and chemical manufacturing | \$ 194,679.65 | 0.00000332877 | 0.00000237171 | 0.00000179645 |
| 187 - Other miscellaneous chemical product manufacturing | \$ 139,904.28 | 0.00000542168 | 0.00000413769 | 0.00000313409 |
| 188 - Plastics packaging materials and unlaminated film and sheet manufacturing | \$ 102,217.27 | 0.00000083210 | 0.00000056381 | 0.00000042706 |
| 19 - Support activities for agriculture and forestry | \$ 51,229.95 | 0.00059902452 | 0.00043581411 | 0.00033010689 |
| 190 - Plastics pipe and pipe fitting manufacturing | \$ 134,869.17 | 0.00000136893 | 0.00000098817 | 0.00000074849 |
| 192 - Polystyrene foam product manufacturing | \$ 51,865.49 | 0.00000092769 | 0.00000065860 | 0.00000049885 |
| 193 - Urethane and other foam product (except polystyrene) manufacturing | \$ 78,946.45 | 0.00000061984 | 0.00000044555 | 0.00000033748 |
| 194 - Plastics bottle manufacturing | \$ 127,441.60 | 0.00000051293 | 0.00000033738 | 0.00000028312 |
| 195 - Other plastics product manufacturing | \$ 73,567.88 | 0.00001267899 | 0.00000914038 | 0.00000692337 |
| 196 - Tire manufacturing | \$ 62,210.48 | 0.00000066185 | 0.00000070933 | 0.00000053728 |
| 197 - Rubber and plastics hoses and belting manufacturing | \$ 59,865.35 | 0.00000022338 | 0.00000021670 | 0.00000016414 |
| 198 - Other rubber product manufacturing | \$ 70,291.13 | 0.00000055321 | 0.00000041677 | 0.00000031569 |
| 199 - Pottery, ceramics, and plumbing fixture manufacturing | \$ 25,666.56 | 0.00000049247 | 0.00000035033 | 0.00000026536 |
| 20 - Extraction of natural gas and crude petroleum | \$ 448,316.38 | 0.000097744676 | 0.00008240113 | 0.00006241464 |
| 202 - Other pressed and blown glass and glassware manufacturing | \$ 63,798.97 | 0.00000044325 | 0.00000029981 | 0.00000022709 |
| 203 - Glass container manufacturing | \$ 96,696.85 | 0.00000032623 | 0.00000023321 | 0.00000017664 |
| 204 - Glass product manufacturing made of purchased glass | \$ 68,317.59 | 0.00000288605 | 0.00000202160 | 0.00000153126 |
| 206 - Ready-mix concrete manufacturing | \$ 100,105.64 | 0.00000021493 | 0.00000015489 | 0.00000011732 |
| 207 - Concrete block and brick manufacturing | \$ 121,281.70 | 0.00000057812 | 0.00000041094 | 0.00000031126 |
| 208 - Concrete pipe manufacturing | \$ 132,703.14 | 0.00000017451 | 0.00000014532 | 0.00000011007 |
| 209 - Other concrete product manufacturing | \$ 84,668.39 | 0.00000042472 | 0.00000033135 | 0.00000025098 |
| 21 - Extraction of natural gas liquids | \$ 120,001.74 | 0.00004032199 | 0.00003409634 | 0.00002582623 |
| 212 - Abrasive product manufacturing | \$ 120,594.86 | 0.00000159373 | 0.00000112387 | 0.00000085127 |
| 213 - Cut stone and stone product manufacturing | \$ 50,182.05 | 0.00000320759 | 0.00000249122 | 0.00000188697 |
| 215 - Mineral wool manufacturing | \$ 152,079.01 | 0.00004293056 | 0.00003036858 | 0.00002320716 |
| 229 - Ferrous metal foundries | \$ 76,231.15 | 0.00000020716 | 0.00000016114 | 0.00000012206 |
| 230 - Nonferrous metal foundries | \$ 62,254.84 | 0.00000018804 | 0.00000013771 | 0.00000010431 |
| 231 - Iron and steel forging | \$ 111,814.84 | 0.00000044240 | 0.00000032513 | 0.00000024627 |
| 232 - Nonferrous forging | \$ 127,169.40 | 0.00000025935 | 0.00000019050 | 0.00000014429 |
| 233 - Custom roll forming | \$ 122,110.47 | 0.00000011365 | 0.00000008466 | 0.00000006413 |
| 234 - Crown and closure manufacturing and metal stamping | \$ 59,548.24 | 0.00000032198 | 0.00000024516 | 0.00000018569 |
| 235 - Cutlery, utensil, pot, and pan manufacturing | \$ 170,460.32 | 0.00000011039 | 0.00000007861 | 0.00000005954 |
| 236 - Handtool manufacturing | \$ 173,675.42 | 0.00000077930 | 0.00000056324 | 0.00000042663 |
| 237 - Prefabricated metal buildings and components manufacturing | \$ 94,541.56 | 0.00000078612 | 0.00000054536 | 0.00000041308 |
| 238 - Fabricated structural metal manufacturing | \$ 73,477.07 | 0.00000072776 | 0.00000056906 | 0.00000043103 |
| 239 - Plate work manufacturing | \$ 59,068.65 | 0.00000063194 | 0.00000055816 | 0.00000042278 |
| 24 - Gold ore mining | \$ 95,636.56 | 0.00000030975 | 0.00000022840 | 0.00000017300 |
| 240 - Metal window and door manufacturing | \$ 81,124.21 | 0.00002296420 | 0.00001613974 | 0.00001222503 |
| 241 - Sheet metal work manufacturing | \$ 57,446.39 | 0.00000699501 | 0.0000489423 | 0.00000370713 |
| 242 - Ornamental and architectural metal work manufacturing | \$ 73,758.20 | 0.00001025559 | 0.00000079087 | 0.00000059904 |
| 243 - Power boiler and heat exchanger manufacturing | \$ 133,951.38 | 0.00000018392 | 0.00000013705 | 0.00000010381 |
| 247 - Hardware manufacturing | \$ 142,974.99 | 0.00000067122 | 0.00000047867 | 0.00000036257 |
| 248 - Spring and wire product manufacturing | \$ 102,433.64 | 0.00000086261 | 0.00000065945 | 0.00000049950 |
| 249 - Machine shops | \$ 62,466.79 | 0.00001057813 | 0.00000837551 | 0.00000634402 |

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|---|----|------------|----------------|----------------|----------------|
| 250 - Turned product and screw, nut, and bolt manufacturing | \$ | 126,284.19 | 0.00000073315 | 0.00000053488 | 0.00000040514 |
| 251 - Metal heat treating | \$ | 93,585.85 | 0.00000060131 | 0.00000047807 | 0.00000036211 |
| 252 - Metal coating and nonprecious engraving | \$ | 74,544.55 | 0.00000242964 | 0.00000194595 | 0.00000147396 |
| 253 - Electroplating, anodizing, and coloring metal | \$ | 71,859.34 | 0.00000343869 | 0.00000272660 | 0.00000206536 |
| 254 - Valve and fittings, other than plumbing, manufacturing | \$ | 189,466.11 | 0.00000023123 | 0.00000018772 | 0.00000014219 |
| 255 - Plumbing fixture fitting and trim manufacturing | \$ | 292,147.23 | 0.00000047581 | 0.00000033206 | 0.00000025152 |
| 256 - Ball and roller bearing manufacturing | \$ | 191,759.38 | 0.00000119930 | 0.00000104341 | 0.00000079033 |
| 259 - Small arms, ordnance, and accessories manufacturing | \$ | 296,969.24 | 0.00000052718 | 0.00000517254 | 0.00000391794 |
| 260 - Fabricated pipe and pipe fitting manufacturing | \$ | 58,430.92 | 0.00000021156 | 0.00000014819 | 0.00000011224 |
| 261 - Other fabricated metal manufacturing | \$ | 66,519.37 | 0.00000325261 | 0.00000232469 | 0.00000176083 |
| 266 - Oil and gas field machinery and equipment manufacturing | \$ | 93,823.36 | 0.00000014495 | 0.00000011976 | 0.00000009071 |
| 271 - All other industrial machinery manufacturing | \$ | 78,302.76 | 0.00000010047 | 0.00000007889 | 0.00000005976 |
| 274 - Other commercial service industry machinery manufacturing | \$ | 126,228.39 | 0.00000029952 | 0.00000018142 | 0.00000013742 |
| 275 - Air purification and ventilation equipment manufacturing | \$ | 81,690.44 | 0.00000028815 | 0.00000023568 | 0.00000017852 |
| 276 - Heating equipment (except warm air furnaces) manufacturing | \$ | 124,092.31 | 0.00001041551 | 0.00000768412 | 0.00000582033 |
| 277 - Air conditioning, refrigeration, and warm air heating equipment manufact. | \$ | 107,066.71 | 0.00000086754 | 0.00000062521 | 0.00000047356 |
| 281 - Machine tool manufacturing | \$ | 166,592.97 | 0.00000089793 | 0.00000062064 | 0.00000047010 |
| 286 - Other engine equipment manufacturing | \$ | 175,122.32 | 0.00000019476 | 0.00000012430 | 0.00000009415 |
| 287 - Pump and pumping equipment manufacturing | \$ | 69,504.15 | 0.00000012111 | 0.00000008685 | 0.00000006579 |
| 288 - Air and gas compressor manufacturing | \$ | 120,544.68 | 0.00000033371 | 0.00000024819 | 0.00000018799 |
| 293 - Industrial truck, trailer, and stacker manufacturing | \$ | 93,707.23 | 0.00000011011 | 0.00000008690 | 0.00000006583 |
| 3 - Vegetable and melon farming | \$ | 116,839.45 | 0.00021844704 | 0.00016615545 | 0.00012585426 |
| 30 - Stone mining and quarrying | \$ | 146,209.45 | 0.00005512774 | 0.00003918037 | 0.00002967713 |
| 300 - Scales, balances, and miscellaneous general purpose machinery manufactu | \$ | 119,386.34 | 0.00000018460 | 0.00000013553 | 0.00000010266 |
| 302 - Computer storage device manufacturing | \$ | 328,837.07 | 0.00000022459 | 0.00000011858 | 0.00000008982 |
| 303 - Computer terminals and other computer peripheral equipment manufactu | \$ | 285,608.31 | 0.00000134696 | 0.00000083434 | 0.00000063197 |
| 304 - Telephone apparatus manufacturing | \$ | 187,224.82 | 0.00000017707 | 0.00000015859 | 0.00000012012 |
| 305 - Broadcast and wireless communications equipment manufacturing | \$ | 146,950.44 | 0.00000166554 | 0.00000145793 | 0.00000110431 |
| 307 - Audio and video equipment manufacturing | \$ | 103,304.30 | 0.00000138705 | 0.00000089975 | 0.00000068152 |
| 309 - Semiconductor and related device manufacturing | \$ | 292,864.12 | 0.00001562885 | 0.00001406114 | 0.00001065059 |
| 31 - Sand and gravel mining | \$ | 162,848.81 | 0.00000451304 | 0.00000321259 | 0.00000243337 |
| 310 - Capacitor, resistor, coil, transformer, and other inductor manufacturing | \$ | 68,322.04 | 0.00000074124 | 0.00000064917 | 0.00000049171 |
| 311 - Electronic connector manufacturing | \$ | 129,149.20 | 0.00000081167 | 0.00000062685 | 0.00000047481 |
| 312 - Printed circuit assembly (electronic assembly) manufacturing | \$ | 86,538.52 | 0.00000136586 | 0.00000095462 | 0.00000072308 |
| 313 - Other electronic component manufacturing | \$ | 123,635.43 | 0.00000057093 | 0.00000041237 | 0.00000031235 |
| 314 - Electromedical and electrotherapeutic apparatus manufacturing | \$ | 732,677.73 | 0.00000015574 | 0.00000011191 | 0.00000008476 |
| 317 - Industrial process variable instruments manufacturing | \$ | 212,506.16 | 0.00000017355 | 0.00000013019 | 0.00000009861 |
| 320 - Analytical laboratory instrument manufacturing | \$ | 110,287.61 | 0.00000013038 | 0.00000007746 | 0.00000005867 |
| 322 - Watch, clock, and other measuring and controlling device manufacturing | \$ | 137,262.82 | 0.00000163686 | 0.00000111658 | 0.00000084576 |
| 324 - Software and other prerecorded and record reproducing | \$ | 116,931.56 | 0.00000047795 | 0.00000035439 | 0.00000026843 |
| 325 - Electric lamp bulb and part manufacturing | \$ | 84,643.70 | 0.00000115620 | 0.00000077413 | 0.00000058636 |
| 326 - Lighting fixture manufacturing | \$ | 100,576.40 | 0.00000295552 | 0.00000213570 | 0.00000161768 |
| 327 - Small electrical appliance manufacturing | \$ | 459,988.99 | 0.00000013848 | 0.00000010454 | 0.00000007918 |
| 332 - Power, distribution, and specialty transformer manufacturing | \$ | 754,342.52 | 0.00000002495 | 0.00000001751 | 0.00000001326 |
| 333 - Motor and generator manufacturing | \$ | 147,705.57 | 0.00000108352 | 0.00000084926 | 0.00000064327 |
| 335 - Relay and industrial control manufacturing | \$ | 118,818.18 | 0.00000026975 | 0.00000020400 | 0.00000015452 |
| 336 - Storage battery manufacturing | \$ | 93,882.26 | 0.00000148875 | 0.00000137991 | 0.00000104521 |
| 337 - Primary battery manufacturing | \$ | 128,634.34 | 0.00000023530 | 0.00000015089 | 0.00000011429 |
| 339 - Other communication and energy wire manufacturing | \$ | 93,159.55 | 0.00000024462 | 0.00000019542 | 0.00000014802 |
| 340 - Wiring device manufacturing | \$ | 85,047.80 | 0.00000099026 | 0.00000070013 | 0.00000053032 |
| 342 - All other miscellaneous electrical equipment and component manufacturin | \$ | 107,196.51 | 0.00000041914 | 0.00000029320 | 0.00000022208 |
| 343 - Automobile manufacturing | \$ | 179,619.01 | 0.00000037570 | 0.00000030937 | 0.00000023433 |
| 349 - Travel trailer and camper manufacturing | \$ | 41,985.49 | 0.00000496382 | 0.00000156352 | 0.00000118429 |
| 350 - Motor vehicle gasoline engine and engine parts manufacturing | \$ | 123,917.93 | 0.00000019691 | 0.00000017322 | 0.00000013120 |
| 352 - Motor vehicle steering, suspension component (except spring), and brake | \$ | 290,564.81 | 0.00000036165 | 0.00000030500 | 0.00000023102 |
| 356 - Other motor vehicle parts manufacturing | \$ | 98,864.45 | 0.00000294269 | 0.00000284066 | 0.00000215165 |
| 359 - Other aircraft parts and auxiliary equipment manufacturing | \$ | 133,641.69 | 0.00000423986 | 0.00000350475 | 0.00000265467 |
| 360 - Guided missile and space vehicle manufacturing | \$ | 163,016.16 | 0.00000076146 | 0.00000063632 | 0.00000048198 |
| 364 - Boat building | \$ | 68,324.56 | 0.000005508505 | 0.00001682602 | 0.00001274485 |
| 365 - Motorcycle, bicycle, and parts manufacturing | \$ | 113,341.25 | 0.00000521317 | 0.00000162288 | 0.00000122925 |
| 366 - Military armored vehicle, tank, and tank component manufacturing | \$ | 343,918.00 | 0.00000004415 | 0.00000003633 | 0.00000002752 |
| 367 - All other transportation equipment manufacturing | \$ | 48,200.63 | 0.00000027744 | 0.00000019135 | 0.00000014494 |
| 368 - Wood kitchen cabinet and countertop manufacturing | \$ | 48,668.58 | 0.00001476812 | 0.00001003155 | 0.00000759839 |
| 369 - Upholstered household furniture manufacturing | \$ | 72,021.10 | 0.00000267689 | 0.00000169657 | 0.00000128507 |
| 37 - Drilling oil and gas wells | \$ | 196,526.05 | 0.00000022284 | 0.00000017436 | 0.00000013207 |
| 370 - Nonupholstered wood household furniture manufacturing | \$ | 43,240.59 | 0.00000384638 | 0.00000243802 | 0.00000184668 |
| 371 - Other household nonupholstered furniture manufacturing | \$ | 47,196.99 | 0.00000068456 | 0.00000043782 | 0.00000033162 |
| 375 - Office furniture, except wood, manufacturing | \$ | 84,253.53 | 0.00000018658 | 0.00000012364 | 0.00000009365 |
| 376 - Showcase, partition, shelving, and locker manufacturing | \$ | 55,882.49 | 0.00000077999 | 0.000000053193 | 0.000000040291 |
| 377 - Mattress manufacturing | \$ | 24,334.23 | 0.00000082539 | 0.00000052390 | 0.00000039683 |
| 378 - Blind and shade manufacturing | \$ | 29,274.80 | 0.00000098779 | 0.00000062661 | 0.00000047463 |
| 379 - Surgical and medical instrument manufacturing | \$ | 162,402.15 | 0.00000240672 | 0.00000170343 | 0.00000129026 |
| 38 - Support activities for oil and gas operations | \$ | 126,328.97 | 0.00003985230 | 0.000003118204 | 0.00002361880 |
| 380 - Surgical appliance and supplies manufacturing | \$ | 133,090.01 | 0.00000889995 | 0.00000646983 | 0.00000490056 |
| 381 - Dental equipment and supplies manufacturing | \$ | 118,082.05 | 0.00000147905 | 0.00000108966 | 0.00000082536 |
| 383 - Dental laboratories | \$ | 33,922.12 | 0.00000316615 | 0.00000233298 | 0.00000176711 |
| 384 - Jewelry and silverware manufacturing | \$ | 55,132.23 | 0.00000074514 | 0.00000051694 | 0.00000039156 |
| 385 - Sporting and athletic goods manufacturing | \$ | 61,424.08 | 0.00001088824 | 0.00000861147 | 0.00000652275 |
| 386 - Doll, toy, and game manufacturing | \$ | 43,525.44 | 0.00000019848 | 0.00000015184 | 0.00000011501 |
| 388 - Sign manufacturing | \$ | 37,957.13 | 0.00006205114 | 0.00004882519 | 0.00003698258 |
| 39 - Metal mining services | \$ | 208,479.10 | 0.00000004478 | 0.00000003366 | 0.00000002550 |
| 390 - Musical instrument manufacturing | \$ | 65,093.72 | 0.00000648480 | 0.00000432906 | 0.00000327904 |
| 394 - All other miscellaneous manufacturing | \$ | 42,638.10 | 0.00001217181 | 0.00000834084 | 0.00000631776 |
| 395 - Wholesale trade | \$ | 180,232.64 | 0.02372305457 | 0.01764225262 | 0.01336310368 |
| 396 - Retail - Motor vehicle and parts dealers | \$ | 138,779.32 | 0.01400928768 | 0.01018788204 | 0.00771679938 |
| 397 - Retail - Furniture and home furnishings stores | \$ | 72,309.19 | 0.00477903436 | 0.00355962459 | 0.00269623350 |
| 398 - Retail - Electronics and appliance stores | \$ | 47,367.95 | 0.00378785186 | 0.00281971771 | 0.00213579190 |
| 399 - Retail - Building material and garden equipment and supplies stores | \$ | 78,135.20 | 0.01065634971 | 0.00793908217 | 0.00601344854 |
| 4 - Fruit farming | \$ | 43,290.99 | 0.00170124552 | 0.00125957537 | 0.00095406390 |
| 40 - Other nonmetallic minerals services | \$ | 137,520.78 | 0.00000010106 | 0.00000007549 | 0.00000005718 |
| 400 - Retail - Food and beverage stores | \$ | 60,516.54 | 0.02858457768 | 0.02075159560 | 0.01571827190 |
| 401 - Retail - Health and personal care stores | \$ | 67,046.89 | 0.01023386626 | 0.00762691178 | 0.00577699544 |
| 402 - Retail - Gasoline stores | \$ | 154,305.31 | 0.00458502962 | 0.00341377465 | 0.00258575963 |
| 403 - Retail - Clothing and clothing accessories stores | \$ | 48,802.85 | 0.011578063706 | 0.01175187532 | 0.00890144427 |
| 404 - Retail - Sporting goods, hobby, musical instrument and book stores | \$ | 36,021.03 | 0.00660468298 | 0.00492222954 | 0.00372833703 |
| 405 - Retail - General merchandise stores | \$ | 54,117.04 | 0.02573685345 | 0.01868439034 | 0.01415246969 |
| 406 - Retail - Miscellaneous store retailers | \$ | 41,553.60 | 0.01182755984 | 0.00881352584 | 0.00667579487 |
| 407 - Retail - Nonstore retailers | \$ | 73,930.62 | 0.01924224613 | 0.01425066657 | 0.01079369631 |
| 408 - Air transportation | \$ | 207,927.46 | 0.00049813000 | 0.00030076657 | 0.00022781529 |
| 409 - Rail transportation | \$ | 164,252.59 | 0.00003715005 | 0.00002803884 | 0.00002123799 |
| 410 - Water transportation | \$ | 173,614.23 | 0.00000853053 | 0.00000562954 | 0.00000426409 |

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| 411 - Truck transportation | \$ | 67,412.61 | 0.00455599388 | 0.00321697988 | 0.00243669766 |
| 412 - Transit and ground passenger transportation | \$ | 28,820.08 | 0.00760992977 | 0.00453197355 | 0.00343273809 |
| 413 - Pipeline transportation | \$ | 280,573.03 | 0.00001722134 | 0.00001443889 | 0.00001093672 |
| 414 - Scenic and sightseeing transportation and support activities for transporta | \$ | 87,484.34 | 0.00164055615 | 0.00123270645 | 0.00093371206 |
| 415 - Couriers and messengers | \$ | 68,860.17 | 0.00281171261 | 0.00194965424 | 0.00147676333 |
| 416 - Warehousing and storage | \$ | 70,772.34 | 0.00211008527 | 0.00156413608 | 0.00118475305 |
| 417 - Newspaper publishers | \$ | 107,737.35 | 0.00042941790 | 0.00032478798 | 0.00024601028 |
| 418 - Periodical publishers | \$ | 123,598.77 | 0.00036329786 | 0.00027013048 | 0.00020461002 |
| 419 - Book publishers | \$ | 709,260.87 | 0.00045635784 | 0.00032330106 | 0.00024488401 |
| 42 - Electric power generation - Fossil fuel | \$ | 880,732.99 | 0.00004437996 | 0.00004145084 | 0.00003139689 |
| 420 - Directory, mailing list, and other publishers | \$ | 436,953.11 | 0.00050536323 | 0.00038677203 | 0.00029296003 |
| 422 - Software publishers | \$ | 135,246.73 | 0.00123053109 | 0.00065288372 | 0.00049452602 |
| 423 - Motion picture and video industries | \$ | 80,422.82 | 0.00158731356 | 0.00118946769 | 0.00090096092 |
| 424 - Sound recording industries | \$ | 151,308.83 | 0.00010895927 | 0.00007085784 | 0.00005367119 |
| 425 - Radio and television broadcasting | \$ | 768,151.75 | 0.00060407948 | 0.00048271339 | 0.00036563070 |
| 426 - Cable and other subscription programming | \$ | 1,654,653.47 | 0.00005570958 | 0.00004809205 | 0.00003642727 |
| 427 - Wired telecommunications carriers | \$ | 217,416.02 | 0.00385071463 | 0.00366379782 | 0.00277513939 |
| 428 - Wireless telecommunications carriers (except satellite) | \$ | 580,995.51 | 0.00076815362 | 0.00070734030 | 0.00053577408 |
| 429 - Satellite, telecommunications resellers, and all other telecommunications | \$ | 82,531.46 | 0.00067296679 | 0.00064188015 | 0.00048619137 |
| 430 - Data processing, hosting, and related services | \$ | 109,701.81 | 0.00107975320 | 0.00100194463 | 0.00075892179 |
| 431 - News syndicates, libraries, archives and all other information services | \$ | 131,390.10 | 0.00030880315 | 0.00022447840 | 0.00017003090 |
| 432 - Internet publishing and broadcasting and web search portals | \$ | 30,016.13 | 0.00012877983 | 0.00009812436 | 0.00007432418 |
| 433 - Monetary authorities and depository credit intermediation | \$ | 281,469.75 | 0.01096471018 | 0.01135031589 | 0.00859728354 |
| 434 - Nondepository credit intermediation and related activities | \$ | 91,658.79 | 0.01094614936 | 0.00905065030 | 0.00685540452 |
| 435 - Securities and commodity contracts intermediation and brokerage | \$ | 48,175.64 | 0.00317663509 | 0.00351056287 | 0.00265907175 |
| 436 - Other financial investment activities | \$ | 11,238.99 | 0.02175412725 | 0.02567440309 | 0.01944704670 |
| 437 - Insurance carriers | \$ | 259,409.57 | 0.00524425686 | 0.00391433653 | 0.00296490965 |
| 438 - Insurance agencies, brokerages, and related activities | \$ | 63,261.71 | 0.01508293081 | 0.01261761748 | 0.00955719966 |
| 439 - Funds, trusts, and other financial vehicles | \$ | 90,891.60 | 0.00565399673 | 0.00702581734 | 0.00532169716 |
| 44 - Electric power generation - Solar | \$ | 758,904.76 | 0.00001485565 | 0.00001387517 | 0.00001050973 |
| 440 - Real estate | \$ | 136,123.81 | 0.04935353776 | 0.04872928720 | 0.03690994180 |
| 442 - Automotive equipment rental and leasing | \$ | 209,763.04 | 0.00109272494 | 0.00076406748 | 0.00057874202 |
| 443 - General and consumer goods rental except video tapes and discs | \$ | 53,387.31 | 0.00219211660 | 0.00171399992 | 0.00129826724 |
| 444 - Video tape and disc rental | \$ | 224,916.20 | 0.00007337791 | 0.00005872659 | 0.00004448239 |
| 445 - Commercial and industrial machinery and equipment rental and leasing | \$ | 192,389.69 | 0.00066038497 | 0.00049258470 | 0.00037310771 |
| 446 - Lessors of nonfinancial intangible assets | \$ | 102,462.69 | 0.00030301772 | 0.00023953192 | 0.00018143318 |
| 447 - Legal services | \$ | 103,191.19 | 0.01139129038 | 0.00516091690 | 0.00390913050 |
| 448 - Accounting, tax preparation, bookkeeping, and payroll services | \$ | 53,605.59 | 0.00885568421 | 0.00694362056 | 0.00525943730 |
| 449 - Architectural, engineering, and related services | \$ | 75,689.39 | 0.00459521467 | 0.00359504244 | 0.00272306071 |
| 450 - Specialized design services | \$ | 53,099.94 | 0.00172391943 | 0.00135788088 | 0.00102852529 |
| 451 - Custom computer programming services | \$ | 104,889.55 | 0.00004258243 | 0.00003379345 | 0.00002559681 |
| 452 - Computer systems design services | \$ | 74,544.89 | 0.01478121155 | 0.00118938700 | 0.00090089979 |
| 453 - Other computer related services, including facilities management | \$ | 93,623.85 | 0.00125260745 | 0.00099379883 | 0.00075275176 |
| 454 - Management consulting services | \$ | 55,940.98 | 0.000601652669 | 0.00502827278 | 0.00380865936 |
| 455 - Environmental and other technical consulting services | \$ | 42,845.74 | 0.00228526282 | 0.00190203089 | 0.00144069108 |
| 456 - Scientific research and development services | \$ | 149,415.84 | 0.00027951786 | 0.00023370255 | 0.00017701772 |
| 457 - Advertising, public relations, and related services | \$ | 65,105.60 | 0.00285771192 | 0.00224829131 | 0.00170296563 |
| 458 - Photographic services | \$ | 19,842.06 | 0.00320484192 | 0.00221188437 | 0.00167538924 |
| 459 - Veterinary services | \$ | 64,947.01 | 0.00454862618 | 0.0029460542 | 0.00230387994 |
| 460 - Marketing research and all other miscellaneous professional, scientific, anc | \$ | 37,210.19 | 0.00499448441 | 0.00414216390 | 0.00313747722 |
| 461 - Management of companies and enterprises | \$ | 105,967.14 | 0.00362025444 | 0.00265464104 | 0.00201075476 |
| 462 - Office administrative services | \$ | 63,348.05 | 0.00306305403 | 0.00249304792 | 0.00188835624 |
| 463 - Facilities support services | \$ | 61,893.42 | 0.00015934993 | 0.00012312704 | 0.00009326243 |
| 464 - Employment services | \$ | 61,402.26 | 0.01644552777 | 0.01357957071 | 0.01028583001 |
| 465 - Business support services | \$ | 46,237.86 | 0.00413624310 | 0.00307593945 | 0.00232986675 |
| 466 - Travel arrangement and reservation services | \$ | 85,748.57 | 0.00190129017 | 0.00087709871 | 0.00064357470 |
| 467 - Investigation and security services | \$ | 39,795.53 | 0.00327569239 | 0.00250347439 | 0.00189625376 |
| 468 - Services to buildings | \$ | 35,402.87 | 0.01718210370 | 0.01246370224 | 0.00944061674 |
| 469 - Landscape and horticultural services | \$ | 40,006.45 | 0.00923606025 | 0.00657738213 | 0.00498203043 |
| 470 - Other support services | \$ | 115,304.12 | 0.00098141105 | 0.00073448475 | 0.00055633462 |
| 471 - Waste management and remediation services | \$ | 113,132.83 | 0.00175471601 | 0.00151534379 | 0.00114779539 |
| 472 - Elementary and secondary schools | \$ | 51,935.98 | 0.01158963450 | 0.00543687924 | 0.00411815784 |
| 473 - Junior colleges, colleges, universities, and professional schools | \$ | 41,166.26 | 0.01472384861 | 0.00540569571 | 0.00404953792 |
| 474 - Other educational services | \$ | 20,026.74 | 0.01430711270 | 0.00812366565 | 0.00615326108 |
| 475 - Offices of physicians | \$ | 90,188.90 | 0.02891724394 | 0.02318044488 | 0.01755800096 |
| 476 - Offices of dentists | \$ | 85,157.00 | 0.01428175112 | 0.01052352897 | 0.00797103476 |
| 477 - Offices of other health practitioners | \$ | 60,438.09 | 0.02169916257 | 0.01361658653 | 0.01031386760 |
| 478 - Outpatient care centers | \$ | 98,102.22 | 0.01064985742 | 0.00720807808 | 0.00545975034 |
| 479 - Medical and diagnostic laboratories | \$ | 58,595.00 | 0.00165416124 | 0.00165416124 | 0.00125294250 |
| 48 - Electric power generation - All other | \$ | 254,555.20 | 0.00002590200 | 0.00002419245 | 0.00001832454 |
| 480 - Home health care services | \$ | 43,431.13 | 0.01996049439 | 0.00734217969 | 0.00556132545 |
| 481 - Other ambulatory health care services | \$ | 75,923.26 | 0.00267121691 | 0.00172890964 | 0.00130956059 |
| 482 - Hospitals | \$ | 115,132.52 | 0.03346456042 | 0.02414612836 | 0.01828945679 |
| 483 - Nursing and community care facilities | \$ | 46,333.58 | 0.01249323237 | 0.01172664966 | 0.00888233712 |
| 484 - Residential mental retardation, mental health, substance abuse and other | \$ | 42,493.79 | 0.00409161882 | 0.00328163459 | 0.00248567030 |
| 485 - Individual and family services | \$ | 21,125.26 | 0.03085521824 | 0.02274856725 | 0.01723087576 |
| 486 - Community food, housing, and other relief services, including rehabilitator | \$ | 62,345.27 | 0.00505419430 | 0.00383338693 | 0.00290359447 |
| 487 - Child day care services | \$ | 39,215.40 | 0.01270901575 | 0.00754402882 | 0.00571421584 |
| 488 - Performing arts companies | \$ | 43,899.82 | 0.00217632931 | 0.00123902181 | 0.00093849563 |
| 489 - Commercial Sports Except Racing | \$ | 29,396.81 | 0.00134495953 | 0.00080512877 | 0.00067801424 |
| 49 - Electric power transmission and distribution | \$ | 843,058.58 | 0.00046761211 | 0.00043674931 | 0.00033081526 |
| 490 - Racing and Track Operation | \$ | 23,331.42 | 0.00029234370 | 0.00018782777 | 0.00014226992 |
| 491 - Promoters of performing arts and sports and agents for public figures | \$ | 26,126.45 | 0.00167363145 | 0.00102501514 | 0.00077639653 |
| 492 - Independent artists, writers, and performers | \$ | 17,732.91 | 0.00653243932 | 0.00462702260 | 0.00350473288 |
| 493 - Museums, historical sites, zoos, and parks | \$ | 39,006.05 | 0.00032626687 | 0.00025363163 | 0.00019211298 |
| 494 - Amusement parks and arcades | \$ | 28,330.33 | 0.00018085381 | 0.00011749598 | 0.00008899719 |
| 495 - Gambling industries (except casino hotels) | \$ | 102,301.14 | 0.00114793957 | 0.00221577656 | 0.00167833737 |
| 496 - Other amusement and recreation industries | \$ | 40,361.65 | 0.00571330088 | 0.00311305704 | 0.00235798142 |
| 497 - Fitness and recreational sports centers | \$ | 29,820.79 | 0.00772123582 | 0.00421957699 | 0.00319611368 |
| 498 - Bowling centers | \$ | 34,094.65 | 0.00078720341 | 0.00041899743 | 0.00031736912 |
| 499 - Hotels and motels, including casino hotels | \$ | 67,856.23 | 0.00037646047 | 0.00034518984 | 0.00026146365 |
| 5 - Tree nut farming | \$ | 110,822.05 | 0.00001057887 | 0.00000771977 | 0.00000584733 |
| 50 - Natural gas distribution | \$ | 265,843.53 | 0.00041931978 | 0.00032448361 | 0.00024577973 |
| 500 - Other accommodations | \$ | 33,030.22 | 0.00000483718 | 0.00000319387 | 0.00000241919 |
| 501 - Full-service restaurants | \$ | 30,330.37 | 0.05687713669 | 0.04095734453 | 0.03102309289 |
| 502 - Limited-service restaurants | \$ | 59,345.58 | 0.06389027858 | 0.04574926689 | 0.03465272889 |
| 503 - All other food and drinking places | \$ | 25,227.62 | 0.02420460437 | 0.01728227566 | 0.01309043956 |
| 504 - Automotive repair and maintenance, except car washes | \$ | 96,147.70 | 0.01690431645 | 0.01353653942 | 0.01025323601 |
| 505 - Car washes | \$ | 48,300.79 | 0.00316639583 | 0.00253824696 | 0.00192259220 |
| 506 - Electronic and precision equipment repair and maintenance | \$ | 119,197.14 | 0.00082606756 | 0.00065861988 | 0.00049887086 |
| 507 - Commercial and industrial machinery and equipment repair and maintenai | \$ | 134,872.06 | 0.00131887193 | 0.00102040682 | 0.00077290596 |

| | | | | | |
|---|----|------------|----------------------|----------------------|----------------------|
| 508 - Personal and household goods repair and maintenance | \$ | 108,184.65 | 0.00334894279 | 0.00203455665 | 0.00154107257 |
| 509 - Personal care services | \$ | 31,415.75 | 0.02174868061 | 0.01593090843 | 0.01206684803 |
| 51 - Water, sewage and other systems | \$ | 205,089.45 | 0.00030580955 | 0.00028036104 | 0.00021235914 |
| 510 - Death care services | \$ | 71,584.86 | 0.00060049835 | 0.00061587728 | 0.00046649553 |
| 511 - Dry-cleaning and laundry services | \$ | 40,887.33 | 0.00224870347 | 0.00149379875 | 0.00113147612 |
| 512 - Other personal services | \$ | 31,746.63 | 0.01606006749 | 0.01145741044 | 0.00867840219 |
| 513 - Religious organizations | \$ | 3,503.10 | 0.00823965468 | 0.00678251346 | 0.00513740692 |
| 514 - Grantmaking, giving, and social advocacy organizations | \$ | 97,465.87 | 0.00313019182 | 0.00256225163 | 0.00194077451 |
| 515 - Business and professional associations | \$ | 146,926.10 | 0.00057031472 | 0.00039296754 | 0.00029765281 |
| 516 - Labor and civic organizations | \$ | 68,199.84 | 0.00600363835 | 0.00389081166 | 0.00294709076 |
| 517 - Private households | \$ | 17,262.67 | 0.01159328573 | 0.00728499664 | 0.00551801221 |
| 518 - Postal service | \$ | 87,740.75 | 0.00194314719 | 0.00155768994 | 0.00117987043 |
| 520 - Other federal government enterprises | \$ | 34,099.31 | 0.00111759041 | 0.00092180591 | 0.00069822081 |
| 525 - Local government electric utilities | \$ | 190,472.29 | 0.00011390278 | 0.00010638510 | 0.00008058127 |
| 526 - Other local government enterprises | \$ | 200,766.06 | 0.00342906829 | 0.00360378960 | 0.00272968623 |
| 6 - Greenhouse, nursery, and floriculture production | \$ | 106,322.27 | 0.00012737711 | 0.00008836578 | 0.00006693256 |
| 62 - Maintenance and repair construction of nonresidential structures | \$ | 88,193.27 | 0.00451736068 | 0.00414338046 | 0.00313839870 |
| 63 - Maintenance and repair construction of residential structures | \$ | 85,849.37 | 0.00527038646 | 0.00362483505 | 0.00274562708 |
| 65 - Dog and cat food manufacturing | \$ | 360,145.67 | 0.00000025125 | 0.00000015843 | 0.00000012000 |
| 71 - Soybean and other oilseed processing | \$ | 232,037.97 | 0.00000082588 | 0.00000061534 | 0.00000046609 |
| 72 - Fats and oils refining and blending | \$ | 130,282.71 | 0.00000157315 | 0.00000124706 | 0.00000094459 |
| 76 - Nonchocolate confectionery manufacturing | \$ | 231,710.06 | 0.00000092055 | 0.00000073458 | 0.00000055641 |
| 79 - Frozen fruits, juices and vegetables manufacturing | \$ | 208,323.68 | 0.00000721185 | 0.00000576055 | 0.00000436332 |
| 80 - Frozen specialties manufacturing | \$ | 173,395.20 | 0.00000393118 | 0.00000314068 | 0.00000237891 |
| 81 - Canned fruits and vegetables manufacturing | \$ | 260,457.32 | 0.00000609488 | 0.00000484193 | 0.00000366751 |
| 87 - Dry, condensed, and evaporated dairy product manufacturing | \$ | 165,154.32 | 0.00000400747 | 0.00000316705 | 0.00000239888 |
| 93 - Seafood product preparation and packaging | \$ | 145,838.04 | 0.00000608267 | 0.00000467839 | 0.00000354364 |
| 94 - Bread and bakery product, except frozen, manufacturing | \$ | 79,683.35 | 0.00005460855 | 0.00005088970 | 0.00003854634 |
| 95 - Frozen cakes and other pastries manufacturing | \$ | 73,116.81 | 0.00000176784 | 0.00000139271 | 0.00000105491 |
| 97 - Dry pasta, mixes, and dough manufacturing | \$ | 167,027.07 | 0.00000063596 | 0.00000050761 | 0.00000038449 |
| 99 - Roasted nuts and peanut butter manufacturing | \$ | 282,327.37 | 0.00000472527 | 0.00000376226 | 0.00000284972 |
| Totals | | | 0.98496479365 | 0.73390517488 | 0.55889561946 |

EXHIBIT B

| Unit Type | Affordable Housing In-Lieu | | |
|-----------------------|----------------------------|---------------|---------------|
| | Year 1 Fee | Year 2 Fee | Year 3 Fee |
| | <i>per unit</i> | | |
| Single Family | \$ 21,500 | \$ 28,750 | \$ 36,000 |
| Multi-Family For Sale | \$ 20,250 | \$ 27,625 | \$ 35,000 |
| Multi-Family For Rent | \$ 17,868 | \$ 22,934 | \$ 28,000 |