



Prioritizing Actions for a More Affordable Future

The City of Pacific Grove is working to create more diverse and affordable housing options that can help secure the community's social, physical and economic well-being, now and into the future. Achieving that goal will require multiple courses of action, by multiple stakeholders.

There are many different strategies the city could pursue. Some require financial resources; some require changes in how the city regulates and approves development; some require partnership and collaboration. No single strategy will solve the ongoing challenge of housing affordability; nor can all the strategies be pursued at once.

Welcome Home is working to define a suite of priority strategies for near- and mid-term action. As an initial step, this document describes a range of potential actions in four broad strategy areas:

- ▶ Land Use Tools
- ▶ Programs and Financial Tools
- ▶ Partnerships and Use of Public Lands
- ▶ Process Tools

This document provides an overview and initial evaluation of potential actions in each category to **start the conversation about where the city should focus its efforts**. The purpose of this initial step is to:

- ✓ Make sure we're not overlooking any key strategies
Are there ideas not included here that you think should be considered?
- ✓ Start considering the relative costs and benefits of alternative strategies
At first glance, which ideas seem the most achievable and able to move the needle on housing in a meaningful way?
What criteria we should use to evaluate and prioritize strategy alternatives?
- ✓ Enable us to effectively focus the next stage of analysis
What questions do we need to answer to know if a strategy will really work?
- ✓ Start to craft a suite of strategies that can be implemented and make a difference
What is the right potential mix actions across these different categories?

Pages 2 - 10 provide a brief overview of each potential strategy or action; **page 11** summarizes proposed evaluation criteria; and **page 12** presents a high-level draft evaluation of each option.

This is a working draft that will evolve based on Advisory Group discussion and input.



Strategy and Action Options

There are a range of potential strategies and actions that the city can pursue—on its own, or in partnership with others—to advance its goal of creating more diverse and affordable housing opportunities in Pacific Grove. This summary covers four broad categories of potential actions:

► **Land Use Tools**

These focus on changing local regulations about what can be built where and how much. Some make explicit links to affordability, while others either add overall housing capacity or create opportunities for housing types that are generally more affordable (e.g., small units and/or multi-unit developments). These options are often low-cost for the city to implement, but likely to face some opposition. An important consideration here is which strategies would be worth the effort based on the type and amount of housing opportunities (especially affordable housing opportunities) that could be created.

► **Programs and Financial Tools**

These are important within an overall housing strategy, but don't directly create more housing capacity. They are sometimes targeted to a specific area of housing need. Some can be used in conjunction with regulatory changes to drive desired outcomes (e.g., rezoning a particular property, combined with a funding source, to create units that serve a priority housing need).

► **Partnerships and Use of Public Lands**

Affordable housing is often created by mission-drive nonprofit housing developers, working in partnership with local jurisdictions and others. City, school district and other publicly held lands (or even private nonprofit lands, like church-owned properties) can provide opportunities to facilitate affordable housing in partnership with nonprofits. Large employers also can use their land and capital to help create much-needed housing for their workers, as was done recently by the Pebble Beach Company.

► **Process Tools**

These focus on making changes to the development review process or fees so that it's easier to build housing generally, and affordable housing specifically. Because drawn-out review processes add risk, time and cost to housing development, this has been a key area of state legislative action in recent years.



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A. LAND USE TOOLS	What It Does	Key Pros (+) Cons (-) Considerations (?)
A1. Increase Allowed Density	Allows more housing in residential and/or mixed use zones by changing standards such as height, setback, floor area ratio, and/or lot coverage. This is an effective strategy for increasing housing supply, and can be coupled with other regulations to ensure that increases in density lead to affordable housing outcomes (either through incentives or requirements). Increases are often targeted to locations close to shopping, jobs, transit, parks and other amenities.	<ul style="list-style-type: none"> + Inexpensive way to add (potentially) significant new housing capacity. - Likely opposed by people in or adjacent to areas where increases are proposed. ? May need to be coupled with a mechanism that helps ensure it creates more units, not just more bulk (i.e., really big homes). ? Any increase will require analysis to determine increased capacity, likely market response, and likely household types and income levels that would be served. ? Water service and coastal zone approvals may limit potential for new units.
A2. Allow Smaller Lots / Subdivisions	This is a form of increasing density, but does so by creating more buildable lots. It is often done in lower density residential areas where large lots can be divided to create two or more homes instead of just one. PG has a history of small lots in its historic neighborhoods. While the original 1887 map of those lots does not have legal status, the city could choose to create a path for subdivision and more small lots, in that area as well as other parts of the city.	<ul style="list-style-type: none"> + Inexpensive way to add new housing capacity. + Consistent with historic patterns in some parts of PG. + Tends to create smaller single family homes that are relatively more affordable due to the smaller lot size and smaller home size. - Potential opposition by people in / adjacent to areas where small lots proposed. - Without subsidy, any single family home in PG, even if small, will be out of reach to lower income and moderate income households. ? Typically not done as a blanket subdivision; but creates a path for properties that meet defined criteria to subdivide if they desire. ? Requires more analysis to determine how many properties (and units) might actually result, and income levels that would be served. ? Water service and coastal zone approvals may limit potential for new units.
A3. Allow Multiplexes (2-6+) in SF Zones	This also increases density, but is focused on creating diverse housing types (duplexes, triplexes and small multi-unit buildings) in low density areas. It is a popular strategy to address what is often referred to as “missing middle” housing. Buildings are generally built at a scale and character to “fit” in single family neighborhoods, but allow more units within them (often consistent with historic patterns, before “single family only” zones were created).	<ul style="list-style-type: none"> + Inexpensive way to add new housing capacity. + Consistent with historic patterns in some parts of PG. + Tends to create smaller units that are relatively more affordable and appealing to households that want to be in lower density neighborhoods. - Likely opposed by people in or adjacent to areas where it’s proposed. - Without subsidy, resulting units would probably be out of reach to lower income households; but might serve moderate income renters (or even some buyers) who don’t want to be in larger apartment and condo developments. ? Requires more analysis to determine expected number, type and cost of units. ? Water service and coastal zone approvals may limit potential for new units.



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A. LAND USE TOOLS (cont'd)	What It Does	Key Pros (+) Cons (-) Considerations (?)
A4. Rezone to Higher Density Residential	Similar to A1, but instead of changing density standards of existing zoning, it rezones specific areas of the city from lower density or non-residential zoning to higher density zoning or to zoning that includes residential uses.	<ul style="list-style-type: none"> + Inexpensive way to add (potentially) significant new housing capacity. - Likely opposed by people in / adjacent to areas where increases proposed. ? May need to be coupled with a mechanism to help ensure desired outcomes. ? Requires analysis to determine increased capacity, likely market response, and likely household types and income levels that would be served. ? Water service and coastal zone approvals may limit potential for new units.
A5. Provide Density Bonuses	State law provides significant density bonuses to affordable housing as well as senior housing, special needs housing and for-sale housing that serves moderate income households. The highest is an 80% bonus for 100% affordable housing. The city has adopted the State law by reference; it could choose to provide additional bonuses for specific types of development and/or in specific parts of the city.	<ul style="list-style-type: none"> + Inexpensive way to add new housing capacity and incentivize affordability. + Because it's a State law, it's more difficult to block at the local level. - Still, use of the bonus will engender opposition from people in / adjacent to areas where developments are proposed. ? Water service and coastal zone approvals are still factors, though State law now gives some additional weight to density bonus projects in the coastal zone.
A6. Create Affordable Housing Overlay	This is a tool for creating incentives such as increased density or special development standards (lower parking, increased height, etc.) for affordable housing development in specific parts of the city. It "overlays" the base zoning to create a path for affordable housing developments to be treated differently, whether 100% affordable or meeting specified threshold criteria.	<ul style="list-style-type: none"> + Inexpensive way to add housing capacity and incentivize affordability. + Can be applied based on criteria such as proximity to jobs or transit rather than following current zoning boundaries. + Can be more politically palatable and less complicated than rezoning. - Is a bit more complicated to implement as it requires review staff to consider both the base zoning and the rules of the overlay. - May not provide significant incentive beyond existing State density bonus law. ? Requires analysis to determine how incentives would work across all the affected zoning districts, as well as likely market response and outcomes. ? Water service and coastal zone approvals may limit potential for new units.
A7. Establish Inclusionary Zoning	Inclusionary zoning requires that a percentage of units in any new residential development be affordable to lower income households, or that a fee be paid to support development of affordable housing elsewhere (or an equivalent land donation or off-site affordable unit). Sometimes is applied to only developments above a certain size; though often a fee is applied to smaller developments.	<ul style="list-style-type: none"> + Requires that all new residential development contribute to meeting the affordable housing challenge. + Often less political opposition as it does not increase density <i>per se</i>. - Can impact economics of market-rate development and result in less development overall (and fewer market rate units = fewer affordable units). ? Can be coupled with density increases / other tools to counter economic impact. ? Water service and coastal zone approvals are still factors.



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A. LAND USE TOOLS (cont'd)	What It Does	Key Pros (+) Cons (-) Considerations (?)
A8. Accelerate ADUs / JADUs	<p>Accessory Dwelling Units (ADUs) are small stand-alone second units that are built on a property, often behind the main house (sometimes called in-law units). Junior Accessory Dwelling Units (JADUs) are created within existing homes, often with their own entry and a small kitchen. They help add housing in existing neighborhoods, and can help homeowners create an income stream to better meet their own housing costs. California recently enacted legislation to encourage ADUs and JADUs throughout the state, and PG recently adopted an ordinance to comply with those requirements. Other actions are underway in the region to help homeowners who want to build ADUs and JADUs. Additional action could be taken to incentivize development, encourage rental of ADUs to lower income households, or further reduce fees and review times.</p>	<ul style="list-style-type: none"> + They create new rental housing options in established neighborhoods. + Homeowners benefit and are therefore generally less opposed. + ADUs are generally more affordable because they are smaller. - They are not a viable housing option for larger households or people needing more space. - They increase the sales price of the single family property even as they create more affordable rental housing (however, for-sale homes in PG are already out of reach for most). ? Helpful to analyze overall ADU/JADU capacity, likely number that will develop, and who is being served. (<i>"ADU Affordability Survey" is now getting underway</i>) ? Generally water service and coastal zone approvals are less a factor as they are an expansion of the existing home rather than a separate new home.
A9. Tiny Homes / Micro-Units	<p>Tiny homes can be manufactured or site built. Jurisdictions around California and the US have taken different approaches to tiny homes. They are like an ADU in many ways, but there is no main "large" home—multiple tiny homes (for-rent or for-sale) are permitted, allowing more housing, on what would otherwise be a single family home property. Micro-units are the multi-story version, essentially very small efficiency apartments with a shared kitchen and other amenities. They offer comparatively low rents.</p>	<ul style="list-style-type: none"> + They create more housing, often significantly more than underlying density limits would allow. + They can be affordable even to lower income households. + They have been used in some places as transitional housing for the unhoused. - They are not a viable housing option for many households. - During the Covid pandemic, shared living spaces in some micro-unit developments have been shut down, proving problematic for residents. ? Water service and coastal zone approvals are still factors.



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A. LAND USE TOOLS (cont'd)	What It Does	Key Pros (+) Cons (-) Considerations (?)
<p>A10. Decrease Parking and/or Other Req.s</p>	<p>Providing parking is expensive, and reduces how much housing can be built on a property, especially in higher density residential developments. While State law has mandated reduced parking standards for affordable and senior housing (through the Density Bonus law), PG could pursue additional strategies to further reduce parking costs and support affordable developments, especially in the downtown and other areas where shared parking approaches are feasible or where people can viably walk to jobs, schools and daily services. Examples of other development requirements that add cost are open space and landscaping requirements, or specific design features.</p>	<ul style="list-style-type: none"> + Helps reduce housing construction costs. + Parking over-supply is a common issue in many places. Reducing the amount of land in the city dedicated to excess car storage is generally a good thing. + PG is a highly walkable town. Transit, car-sharing and other mobility services can make it viable to live here without a car (or with only one car per household). - Many people see parking as a perennial issue and are opposed to any effort to reduce it. ? Can be applied to all development to help bring down costs, or specifically to developments that meet specified affordability or special needs thresholds. ? Would need to analyze the real cost savings that could be achieved and what the city could do beyond State law's existing incentives.
<p>A11. Revisit Voter-established Restrictions</p>	<p>PG's zoning code has a number of restrictions enacted by voters, most of them in the 1980s. Among other things, these prohibit housing on many city- and school-district owned lands. The issues that led to those referendums have changed in the intervening 35+ years, and it may be worth revisiting them, in whole or in part, to enable use of those lands with a broader set of community-serving uses, including affordable housing.</p>	<ul style="list-style-type: none"> + Could create new affordable housing opportunities on sites that are already publicly owned. + Could serve as barometer of public support for affordable housing. - Taking things to a vote is time consuming and complicated; it's hard for people to give time and attention to a complex policy issue and could be easy for those opposed to argue for the status quo. ? Need to understand how schools-owned lands are (or are not) affected by these locally enacted restrictions.



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B. PROGRAMS + FINANCIAL TOOLS	What It Does	Key Pros (+) Cons (-) Considerations (?)
B1. Create a Homeownership Program	Some moderate income households can afford a monthly house payment (it's often similar to or even less than rent), but struggle coming up with the needed downpayment. A homeownership program helps educate homebuyers, strategize for a purchase, and provides downpayment assistance that gets paid back over time or when the homeowner sells.	<ul style="list-style-type: none"> + Helps people achieve homeownership and build equity over time. + There is generally widespread support for such programs (there's little to no impact on others). - Does not add to the housing stock. - Home prices in PG are high, making them ineligible for many programs. - It's expensive in terms of what it costs and how many can be served. ? Would need to analyze and quantify the potential costs/benefits and identify potential funding sources.
B2. Prioritize Housing for Homeless	Homelessness is not as significant in PG as elsewhere in the County, but it is nonetheless a critical issue, which is often hidden from view (people sleeping on friend's couches, or in their cars). There are important efforts at the regional level to help people get back on their feet, supported by groups and services in PG. A programmatic focus on helping create housing opportunities for the homeless—whether shelter services or transitional housing—can work in synch with other aspects of the City's housing strategy to help make a difference.	<ul style="list-style-type: none"> + Responds to a critical need, particularly in response to the pandemic's impacts. + Works in tandem with other strategies, potentially integrating transitional housing as part of an affordable housing effort. - Transitional housing and emergency shelters typically evoke the strongest neighborhood opposition. ? Need to evaluate options and engage with regional partners and service organizations to determine best approach and specific actions/priorities relevant to PG's housing strategy, beyond general increase in affordable housing.
B3. Participate in Affordable Hsg. Trust Fund	Monterey County recently launched a regional housing trust fund and PG has made an initial commitment to it. Combined, the funds will be used to support affordable housing development in the County, including in PG. It's a valuable mechanism that can pool local contributions and then combine them with tax credits, land donations and other financing sources to create new affordable housing.	<ul style="list-style-type: none"> + Pools money from multiple sources to invest in affordable housing. + Able to operate at the regional level to maximize opportunity and impact. - Is not PG-specific. ? Need to consider potential key opportunities in PG that could be used to leverage trust fund dollars.
B4. Create an Affordable Housing Land Trust	A Land Trust is a vehicle to pool, manage and preserve land resources. It is most commonly used for land conservation, but can also be used for affordable housing. Most often the land is used for developing the housing, but the value of donated or purchased land can also be used to generate revenue to build affordable housing on other sites.	<ul style="list-style-type: none"> + Builds long-term land resources and value. + Could provide an opportunity for residents to donate their property to a cause they believe in (with related tax benefits). - Requires management and a specific skill set. ? Need to evaluate level of effort against potential value that could be generated. ? Like the Housing Trust Fund, may be more viable as a regional initiative.



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B. PROGRAMS + FINANCIAL TOOLS (cont'd)	What It Does	Key Pros (+) Cons (-) Considerations (?)
B5. Establish Affordable Housing Fees/Taxes	PG is a small jurisdiction with limited financial resources to support affordable housing. However, there are opportunities to generate affordable housing funds via local taxes or fees. Inclusionary zoning can create revenue through in-lieu fee payments, and can also be applied to commercial development in the form of a linkage fee. Other cities also use transient occupancy taxes, real property transfer taxes and other revenues to help fund affordable housing.	<ul style="list-style-type: none"> + Many uses such as commercial development and hospitality businesses add to the need for affordable housing; it's appropriate to find a way for them to help pay for providing it. + A property transfer tax helps capture a small portion of escalating home prices to help pay for much-needed affordable housing. - Tax revenues that are going to affordable housing are not going to other needs. - People are generally opposed to taxes, especially in a time of economic pain. ? Need to evaluate which options have potential support and analyze how much revenue they might actually generate. A "nexus" study may also be needed.
B6. Repurpose Housing Rehab Loans	PG has been operating an income-qualified rehab loan program for 25+ years. Repayment is deferred til time of sale or transfer, allowing low income households to make needed health and safety repairs. With rising home prices and incomes, however, there are fewer homeowners in PG who qualify. One idea is to repurpose the program to focus on rental housing, or use the funds for other needs.	<ul style="list-style-type: none"> + Makes existing housing safer and more sustainable. + Helps low-income homeowners make much-needed repairs. - Fewer and fewer households can qualify based on income. - The existing program is well-regarded; would be hard to change it. - Focus is on homeowners; some of the worst housing conditions are in rentals. ? Shifting to rental housing would require a fundamental restructuring of the program.
B7. Facilitate Home Sharing	Home sharing programs typically help match fixed income seniors who have "too much house" with people who are looking to rent a room. It's a win-win, providing the homeowner with needed income as well as social interaction, and the renter with quality housing at a reasonable cost.	<ul style="list-style-type: none"> + Could be a good fit for PG, with many older homeowners who are now "empty nesters" as well as younger students and workers seeking quality rental housing. - Requires time and money to set up and manage. ? Explore possibility of teaming with other jurisdictions to bring Covia, a home match program in the SF Bay Area, into the Monterey Bay Area.
B8. Purchase/Rehab Existing Rental Housing	PG could team with a nonprofit housing group to identify and purchase existing multifamily housing that is in need of reinvestment, helping to rehabilitate it and bring it under long-term ownership of a mission-driven organization that would manage it as income-qualified affordable housing.	<ul style="list-style-type: none"> + Improves lower quality housing and makes it part of the long-term affordable housing stock. + Typically less neighborhood opposition because the housing is already there. - Does not add new housing (though depending on the site and building there may be an opportunity to expand the number of units). - Needs to be carefully managed so that existing low income residents are not displaced. ? Would need to evaluate potential properties and analyze the cost/benefit, ideally working in collaboration with a potential partner.



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C. PARTNERSHIPS / USE OF PUBLIC LANDS	What It Does	Key Pros (+) Cons (-) Considerations (?)
C1. Facilitate Employer-Assisted Housing	Many local employers struggle with attracting and retaining staff due to high housing costs. As a result some have started creating or subsidizing housing to meet their employees' needs (Pebble Beach Co. is a recent local example). The city and/or a nonprofit housing partner could work with local employers that have land and/or financial resources to help create new affordable work force housing, helping leverage other potential resources.	<ul style="list-style-type: none"> + Engages partners who have a stake in creating affordable housing. + Creates a direct link between local jobs/incomes and housing needs (it's serving people who are already a part of our community but can't afford to live here). + Can help reduce traffic and related emissions associated with commuting. - In the current economic crisis, many local employers are not in a financial position to invest in housing even though the needs of their employees are more profound than ever. ? Explore possibilities through discussions with MBEP and others.
C2. Pursue Joint Development of Key Sites	The city and other public, charitable or mission-driven groups own land that could be used to support affordable housing development. In this strategy, a nonprofit housing developer becomes a key partner, with the city (and/or others) providing land (free or subsidized), supportive regulations, streamlined approval and potentially funding to help make desired affordable housing a reality.	<ul style="list-style-type: none"> + Focuses efforts on key sites with potential for creating significant outcomes. + Provides more control over the outcome (vs. rezoning properties and creating incentives then seeing how the market responds) - As in any development, will likely experience opposition from neighbors and others even if serving a community need. ? Identify the key opportunity sites and engage in a first-level alternatives analysis of potential development program and costs.
C3. Pursue Housing on School District Sites	This strategy is similar to C2, but focused on sites owned by the school district, which is a state agency (therefore subject to a different set of rules). As a large employer that needs to attract and retain quality teachers and staff, PGUSD has a strong interest in expanding affordable housing opportunities and could be a key partner.	<ul style="list-style-type: none"> + Same as C2; with potential benefit of applying state agency powers and potentially accessing other fund sources. - Will likely experience opposition from neighbors and others even if serving teacher and staff housing needs. ? Explore possibilities through discussions with PGUSD and other potential partners.



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D. PROCESS TOOLS	What It Does	Key Pros (+) Cons (-) Considerations (?)
D1. Reduce Fees for Affordable Housing	<p>New developments pay a variety of fees to help cover the costs of development review and the added impact they have on everything from schools to utility systems, parks and more. In California, such fees can represent anywhere from 6 to 18 percent of the cost of building new housing. Finding ways to reduce or eliminate fees can be a significant contribution toward making affordable housing developments economically viable.</p>	<ul style="list-style-type: none"> + Helps make affordable housing developments more financially feasible. - The city doesn't control many development fees. Other agencies would need to agree to reduce what they charge. - Reducing the fees doesn't reduce the cost for the services and systems the fees are helping to pay for. The cost burden shifts; it doesn't go away. ? Would need to analyze fee structures in PG and evaluate options for reducing, subsidizing or shifting the fees, working in partnership with affected agencies. ? The state legislature is considering several potential bills that would help reduce impact fees for affordable housing.
D2. Streamlined Review of Affordable Hsg.	<p>Time is money. Lengthy and unpredictable review processes add cost and risk to developments, creating a significant obstacle to affordable housing developments. Recognizing that affordable housing is a statewide priority, the State has enacted requirements for streamlined reviews in cities where housing goals are not being met (requiring 60 to 90 day reviews, depending on size of the project). Streamlined reviews replace lengthy discretionary reviews with clear standards and staff-level review.</p>	<ul style="list-style-type: none"> + Helps reduce development costs and provides a clearer path for approval for new affordable housing. + Doesn't require funding but helps lower development costs. - Removing discretionary review will be opposed by those currently involved in the reviews. ? Would need to evaluate current processes and develop process alternatives. ? Could consider hybrid processes that shift public input to early in the process, rely on objective standards that discretionary bodies have already approved, and/or limit the scope of discretionary reviews (with final approval by staff).
D3. Create Objective Design Standards	<p>These are now required by the State to reduce the time and cost related to development review. Clear standards can help create context-sensitive building and site designs without devolving into debates based on personal taste. Compliance with the standards is determined through a staff-level review.</p>	<ul style="list-style-type: none"> + Implements a recent State requirement. + Provides clarity for developers regarding expectations. - Removing discretionary review will be opposed by those currently involved in the reviews. ? Will need to review existing standards and ensure they are clear and objective.
D4. Establish By-Right Standards	<p>This essentially combines D2 and D3 to provide a clear path for affordable housing developments (or even market-rate housing) to receive approval. Applicants know what is required due to clear, objective standards, and have certainty about how much time it will take to get approval.</p>	<p><i>Combination of the pros, cons and considerations of D2 and D3.</i></p>



Evaluating the Options

Different strategy facilitate different outcomes, and some are easier to implement than others. To help guide evaluation of each option, we developed draft criteria, summarized in the tables below.

Are these the right criteria to consider? Are any missing? Should we weight some more than others?

The strategy is worth pursuing because it helps create...

rating	More Units	Smaller Units	Senior Units	Family Units
●	The primary outcome is more capacity for more housing.	The primary outcome is more capacity for smaller units.	The primary outcome is more capacity for senior housing.	The primary outcome is more capacity for family housing.
○	The strategy can be designed or managed to create more housing.	The strategy can be designed or managed to create more small units.	The strategy can be designed or managed to create more senior units.	The strategy can be designed or managed to create more family units.
○	Not applicable	Not applicable	Not applicable	Not applicable

The strategy is worth pursuing because it promotes affordability by...

rating	Creating More Units Overall	Incentivizing Affordability	Ensuring Affordability	Filling Income / Cost Gap	Better Using Existing Housing
●	The strategy helps affordability by creating more housing supply.	The strategy encourages but does not require income-restricted units.	The strategy creates income-restricted units or equivalent.	The strategy helps subsidize housing costs (but doesn't add supply).	The strategy better utilizes existing housing (but doesn't add to supply).
○	The strategy can be designed or managed to create more housing.	The strategy can be designed or managed to incentivize income-restricted units.	The strategy can be designed or managed to create income-restricted units.	The strategy can be designed or managed to help subsidize housing costs.	The strategy can be designed or managed to better utilize existing housing.
○	Not applicable	Not applicable	Not applicable	Not applicable	Not applicable

The strategy may be challenging due to ...

rating	Cost	Complexity	Market Forces	Outside Agencies	Political Will
●	It's expensive to implement (\$ and/or time)	It takes time and skill to pull off; requires experts and partners.	The private market will be uninterested or opposed.	It will require support or approval from other agencies.	There will be vocal opposition from some (or many)
○	It requires time and/or \$, but is manageable.	It's not easy, but it's not hard either. We know how to do it.	The private market may not respond (but won't be opposed).	It will require some support from other agencies.	There will be some opposition to it.
○	It's relatively low cost.	It's not hard to do.	Not applicable	Not applicable	Most will support it.

