Memorandum

DATE: October 10, 2018
TO: Kent Street, Village Manager
FROM: Andrew Lichterman, Assistant Village Manager
SUBJECT: Affordable Housing

Purpose

At the September 17, 2018 Committee of the Whole meeting the Village Board discussed affordable housing and requested staff to research and prepare additional items for consideration. This memorandum discusses alternative methods for compelling or encouraging affordable housing and various administrative oversight methods.

Background

Definitions - The following definitions are from the Illinois Affordable Housing Planning and Appeal Act (AHPAA) (310 ILCS 67/):

"Affordable housing" means housing that has a value or cost or rental amount that is within the means of a household that may occupy moderate-income or low-income housing. In the case of owner-occupied dwelling units, housing that is affordable means housing in which mortgage, amortization, taxes, insurance and condominium or association fees, if any, constitute no more than 30% of gross annual household income for a household of the size that may occupy the unit. In the case of dwelling units for rent, the housing that is affordable means housing for which the rent and utilities constitute no more than 30% of the gross annual household income for a household of the size that may occupy the unit.

"Area median household income" (AMI) means the median household income adjusted for family size for applicable income limit areas as determined annually by the federal Department of Housing and Urban Development.

"Low-income housing" means housing that is affordable for either homeownership or rental, with a gross household income that does not exceed 50% of the area median household income.

"Moderate-income housing" means housing that is affordable with a gross household income that is greater than 50% but does not exceed 80% of the area median household income.

Staff was unable to locate a credible definition of "workforce housing". However, the City of Chicago has used the term is various public documents and defined the term identical to the definition of "moderate-income housing" noted above.

Comprehensive Plan

Pursuant to its home rule powers, the Affordable Housing Planning and Appeal Act, 310 ILCS 67/1, *et seq.*, will not apply within the Village of Deerfield and shall be superseded within the Village by the Zoning Ordinance and Comprehensive Plan of the Village of Deerfield. The Village recognizes the need for affordable housing within the Village and the region in which the Village is located and will give due consideration to those needs and to the opportunity to accommodate new affordable housing options within the Village when opportunities are presented to develop or redevelop significant parcels for residential uses in the Village of Deerfield. The enforcement of federal and state fair housing laws shall be and remain a priority for the Village.

AHPAA Non-Exempt Local Governments
A comprehensive listing of governments and their relative affordable housing share, as of 2013, is enclosed. The report indicates that Deerfield is at 4.0% with 259 affordable housing units.

<u>Inclusionary Zoning</u>
Inclusionary zoning is one method used by municipalities to compel affordable housing development. Inclusionary zoning ordinances in Evanston, Lake Forest, Highland Park and Highwood require developers to include a certain percentage (e.g. 15-20%) of affordable units alongside the market price units in new or rehabilitated housing developments. These ordinance also allow a developer to pay a fee into an affordable housing fund (e.g. $125,000 - $130,000 per required unit), in lieu of providing the required affordable housing on-site. Communities typically then create a Housing Trust Fund that is managed by staff or contracted to a third party in order to administer the on-going revenue sources and subsidize construction of future affordable housing projects. Additionally, inclusionary zoning ordinances often standardize density bonuses (the ability to construct additional market rate units for providing affordable units) or other zoning incentives for developers who provide affordable housing.

Target Income Levels – For Sale
An important element of any inclusionary zoning ordinance is to establish target income levels for the affordable units. For example, in the City of Highland Park, in for-sale projects, at least one – and no less than half – of the affordable units must be sold at an affordable price to households whose incomes do not exceed 80% of AMI (e.g. $67,700 for a household of 4). Any remaining affordable units may be sold at an affordable price to households whose incomes do not exceed 120% AMI.

Target Income Levels – For Rent
For example, in the City of Highland Park, in rental projects, at least one-third of the affordable units must be leased at rents affordable to households whose incomes do not exceed 50% of AMI (e.g. $42,300 for a household of 4); at least one-third must be leased to those whose incomes are between 51% and 80% of AMI; and no more than one-third may be leased to those with incomes from 81% to 120% of AMI.

The most recent schedule of Maximum Annual Gross Household Income is included below:

2018 Gross Income by Percent Area Median Income (AMI) & Expected Occupancy

		Expected Occupancy (# of people in Household)							
	% of AMI	1	2	3	4	5	6	7	8
Gross Household Income	45%	$26,685	$30,465	$34,290	$38,070	$41,130	$44,190	$47,250	$50,265
	50%	$29,650	$33,850	$38,100	$42,300	$45,700	$49,100	$52,500	$55,850
	65%	$38,545	$44,005	$49,530	$54,990	$59,410	$63,830	$68,250	$72,605
	80%	$47,400	$54,200	$60,950	$67,700	$73,150	$78,550	$83,950	$89,400
	100%	$59,300	$67,700	$76,200	$84,600	$91,400	$98,200	$105,000	$111,700
	115%	$68,195	$77,855	$87,630	$97,290	$105,110	$112,930	$120,750	$128,455
	120%	$71,160	$81,240	$91,440	$101,520	$109,680	$117,840	$126,000	$134,040

Source: U.S. Dept. of Housing and Urban Development FY-2018 Income Limits Documentation System, Chicago-Joliet-Naperville, IL HUD Metro FMR Area

Household incomes, as described above, can then be converted into maximum allowable rents. Below is an example of the rental pricing schedule used by the City of Highland Park:

City of Highland Park, IL Affordable Unit Pricing Schedule*
Effective July 1, 2018

	Income Tier					
	Lowest (0% to 50% AMI)		Low (51% to 80% AMI)		Moderate (81%-120% AMI)	
Unit Type / Bedrooms	Avg. 45% AMI	Max 50% AMI	Avg. 65% AMI	Max 80% AMI	Avg. 100% AMI	Max 120% AMI
Efficiency	$667.13	$741.25	$963.63	$1,185.00	$1,482.50	$1,779.00
One	$761.63	$846.25	$1,100.13	$1,355.00	$1,692.50	$2,031.00
Two	$857.25	$952.50	$1,238.25	$1,523.75	$1,905.00	$2,286.00
Three	$951.75	$1,057.50	$1,374.75	$1,692.50	$2,115.00	$2,538.00
Four	$1,028.25	$1,142.50	$1,485.25	$1,828.75	$2,285.00	$2,742.00

Source: City of Highland Park Dept. of Community Development, Planning Division pursuant to Code Sec. 150.2109.

* All rents shown include utilities. If your unit rents do not include utilities the above prices must be adjusted downward – please contact the Div. of Planning for details. Not all units can be rented at the Max amount please see Code Sec. 150.2109 and Sec. 150.2113 for important limitations.

The City of Highland Park reports that since the ordinance has been in effect, it has generated an average of 2-3 affordable units per year.

Deerfield Rentals
For comparison purpose, a summary of Deerfield's rental market over the last six months is included below:

Unit Type	Average Rented Price	# of Properties
1 – Bedroom*	$1,646.25	8
2 – Bedroom	$2,220	8
3 – Bedroom	$2,364.47	19
4 – Bedroom	$3,128.50	14

*12- months of rental data was used due to the low number of rentals that occurred over a 6-month period.
Source: Multiple Listing Service (MLS)

A complete Market Analysis Summary for each type of rental property is enclosed with this report.

Case-by-Case (Hybrid Approach)
In contrast to inclusionary zoning, a case-by-case hybrid approach would be consistent with the language in the Village's comprehensive plan. In theory, groups such as the Community Partners for Affordable Housing (CPAH) and Housing Opportunity Development Corporation (HODC) could be

contracted by the Village to help create standardized policies and procedures for administering affordable housing units on a case-by-case basis such as with the recently proposed REVA development. Many of the elements noted in the inclusionary zoning description, such as setting target income levels, would still need to be established.

Contract Costs

Based on a cursory review, staff estimates that an on-going contract with a third party provider to administer a few dozen affordable housing units would be approximately $20,000 per year. These third party partners would review and complete income verification to ensure that the affordable housing units are being granted to eligible applicants. For rental units, the income verification would be completed annually. In for-sale projects, income verification would only need to be met at the time of closing.

Other Considerations

Other tools and methods to incent affordable housing development that could be included in either an inclusionary zoning ordinance or perhaps implemented on a case-by-case approach would include the following:

- Special Use Criteria - Incorporating affordable housing as a new special use criteria that must be met when applicants petition the Village for special use approval. Affordability could be the eighth standard that the Plan Commission must find when recommending approval of certain types of development, such as in the case of a Planned Unit Development of a certain size.

- Density/Zoning – As previously noted, granting density bonuses, perhaps at a rate of one-to-one, would allow the addition of one market rent unit to be constructed for every one affordable unit constructed. Relatedly, this could also include zoning incentives such as reduced parking, lot size and setback or lot coverage requirements.

- Fees – Reduction (or elimination) of demolition, plan review, building permit, sewer and water tap-on, and/or inspection fees for affordable units. Developer impact fees can also be reduced or eliminated. Certain fee reductions could be quite significant, particularly on large-scale developments. Expedited processing of applications for those developers proposing to provide affordable housing can also be considered.

- Other – The Village Board previously expressed little interest in forming a Housing Trust Fund, which would serve to pool on-going revenues for use to subsidize future affordable housing projects due to the administrative burden. Inter-jurisdictional housing initiatives are also an alternative means of pooling resources and providing regional affordable housing alternatives that have been explored in the past but were found to have barriers and drawbacks.

Conclusion

The Village's share of affordable housing is 4% or 259 units. If the goal is to reach 10%, which would have been the exemption threshold if the Village were not home-rule, approximately 390 affordable units need to be added to the Village's inventory.

Inclusionary zoning ordinances compel developers to incorporate affordable units into their market rent proposals. Evanston, Lake Forest, Highland Park, and Highwood are four nearby communities that have such ordinances in effect. Should the Village Board wish to explore the nuances of inclusionary ordinances further staff would prepare a detailed report on that topic.

Alternatively, if the Village Board wishes to continue to explore affordable housing opportunities on a case-by-case basis staff would work to secure letters of intent from third party providers that can provide on-going administration and oversight of an income verification program that would be a requirement of the program.

In either case, staff would need to know what type of density bonuses and developer incentives are of interest to the Village Board, if any, so that these options can be further reviewed with the Village Attorney.

In 2009, following several workshop meetings discussing the issue of affordable housing, the Plan Commission voted unanimously to recommend that either a housing task force or a commission be established to study the issue of affordable housing. The Village Board subsequently accepted the report and recommendation to appoint an ad hoc task force; however, additional direction was needed regarding who should be appointed to the task force and what guidelines should be considered. Consequently, a task force was never formed but this may be a path the Board wishes to revisit. A task force could review the technical aspects of affordable housing and produce various deliverables including an inclusionary zoning ordinance and/or a formal affordable housing plan.

Deerfield Rental Market Analysis

Source: Multiple Listing Service (MLS) - 6-month period

1 – BEDROOM*

Market Analysis Summary

Comparables

MLS #	Stat	Address	Rntl Pr ($/mo)	Rntd Pr ($/mo)	Rntd Dt	# Rms	Beds	Baths	LMT	MT
09774305	**RNTD**	1153 Deerfield RD A	$1,050	$1,000	12/01/2017	4	1	1	52	52
09963887	**RNTD**	1154 Osterman AVE C	$1,050	$1,050	06/20/2018	4	1	1	27	27
09774114	**RNTD**	625 Deerfield RD 303	$1,595	$1,595	11/28/2017	2	1	1	50	50
09802133	**RNTD**	625 Deerfield RD 306	$1,745	$1,745	12/03/2017	2	1	1	16	16
09757395	**RNTD**	625 Deerfield RD 409	$1,795	$1,795	10/10/2017	2	1	1	20	20
09787618	**RNTD**	625 Deerfield RD 311	$1,830	$1,830	12/29/2017	3	1	1	65	65
09862795	**RNTD**	625 Deerfield RD 418	$1,895	$1,895	04/30/2018	4	1	1	69	69
09757381	**RNTD**	625 Deerfield RD 316	$2,260	$2,260	10/10/2017	3	1	1	20	20

Statistics Total Properties: 8

	Rental Price ($/month)	Rented Price ($/month)	ASF	Beds	Baths	LMT	MT
Minimum	$1,050	$1,000	700	1	1	16	16
Maximum	$2,260	$2,260	1050	1	1	69	69
Average	$1,652.50	$1,646.25	834	1	1	40	40

Sold properties closed averaging 99.62% of their Final List Price (FLP).
This reflects a 0.38% difference between property sale prices and their FLP's.

* 12-months of rental data was used due to the low number of rentals that occurred over a 6-month period.

2 - BEDROOM

Market Analysis Summary

Comparables

MLS #	Stat	Address	Rntl Pr ($/mo)	Rntd Pr ($/mo)	Rntd Dt	# Rms	Beds	Baths	LMT	MT
10035299	**RNTD**	1121 WAUKEGAN RD 5	$1,200	$1,200	10/02/2018	5	2	1	65	65
09971347	**RNTD**	1340 Barclay LN	$1,750	$1,750	06/29/2018	5	2	1	24	24
09844065	**RNTD**	432 Kelburn RD 322	$2,100	$2,100	06/01/2018	5	2	2	123	123
09880999	**RNTD**	372 KELBURN RD 311	$2,265	$2,265	05/01/2018	4	2	2	5	5
09899237	**RNTD**	625 Deerfield RD 308	$2,295	$2,295	05/01/2018	5	2	2	34	34
09895757	**RNTD**	625 Deerfield RD 313	$2,500	$2,550	05/08/2018	5	2	2	44	44
09905020	**RNTD**	1151 Hazel AVE	$2,700	$2,600	06/15/2018	6	2	2	73	73
10044958	**RNTD**	462 S Commons CT	$3,000	$3,000	09/01/2018	6	2	2	12	12

Statistics Total Properties: 8

	Rental Price ($/month)	Rented Price ($/month)	ASF	Beds	Baths	LMT	MT
Minimum	$1,200	$1,200	0	2	1	5	5
Maximum	$3,000	$3,000	1634	2	2	123	123
Average	$2,226.25	$2,220	1006	2	2	48	48

Sold properties closed averaging 99.72% of their Final List Price (FLP).
This reflects a 0.28% difference between property sale prices and their FLP's.

Deerfield Rental Market Analysis

Source: Multiple Listing Service (MLS) - 6-month period

3 - BEDROOM

Market Analysis Summary

Comparables

MLS #	Stat	Address	Rntl Pr ($/mo)	Rntd Pr ($/mo)	Rntd Dt	# Rms	Beds	Baths	LMT	MT
10005182	**RNTD**	1143 Deerfield RD	$1,695	$1,675	07/18/2018	6	3	1	16	16
10043264	**RNTD**	903 Waukegan RD B	$1,800	$1,800	08/31/2018	6	3	1.1	5	5
09871785	**RNTD**	938 HEMLOCK ST	$1,900	$1,900	05/10/2018	6	3	1	70	70
09950576	**RNTD**	907 Waukegan RD A	$1,900	$1,900	06/02/2018	7	3	2	19	19
10012791	**RNTD**	1145 Deerfield RD	$1,950	$1,950	08/10/2018	7	3	2	31	31
09886880	**RNTD**	938 Osterman AVE	$2,050	$2,050	04/23/2018	8	3	2	39	39
10066169	**RNTD**	1048 Camille AVE	$2,075	$2,075	09/21/2018	6	3	1	27	27
10007616	**RNTD**	555 Mallard LN	$2,300	$2,300	09/25/2018	8	3	1.1	44	44
10020104	**RNTD**	520 S Commons CT 0	$2,350	$2,350	07/24/2018	6	3	2	9	9
09758690	**RNTD**	821 Kenton RD	$2,495	$2,400	05/15/2018	6	3	1.1	214	214
09930028	**RNTD**	816 Appletree LN	$2,495	$2,350	09/14/2018	7	3	3	146	146
09924782	**RNTD**	1530 Woodland DR	$2,500	$2,200	09/29/2018	9	3	2	151	151
09967978	**RNTD**	1175 Elmwood PL	$2,500	$2,500	07/16/2018	6	3	2	43	43
09943887	**RNTD**	1051 Warrington RD	$2,550	$2,550	06/01/2018	9	3	2	8	8
09912199	**RNTD**	905 WARRINGTON RD	$2,650	$2,600	07/01/2018	7	3	1.1	45	45
09930725	**RNTD**	510 S Commons CT	$2,975	$2,975	05/24/2018	6	3	2	27	27
10051029	**RNTD**	842 Chestnut ST	$3,000	$3,000	08/24/2018	7	3	4.1	11	11
09942303	**RNTD**	333 Milford RD	$3,200	$3,200	06/26/2018	6	3	2.1	11	11
09905961	**RNTD**	388 Milford RD	$3,250	$3,150	04/13/2018	6	3	2.1	9	9

Statistics

Total Properties: 19

	Rental Price ($/month)	Rented Price ($/month)	ASF	Beds	Baths	LMT	MT
Minimum	$1,695	$1,675	946	3	1	5	5
Maximum	$3,250	$3,200	2585	3	4.1	214	214
Average	$2,401.84	$2,364.47	1583	3	2	49	49

Sold properties closed averaging 98.44% of their Final List Price (FLP).
This reflects a 1.56% difference between property sale prices and their FLP's.

Deerfield Rental Market Analysis

Source: Multiple Listing Service (MLS) - 6-month period

4 – BEDROOM

Market Analysis Summary

Comparables

MLS #	Stat	Address	Rntl Pr ($/mo)	Rntd Pr ($/mo)	Rntd Dt	# Rms	Beds	Baths	LMT	MT
09992862	**RNTD**	1140 Chestnut ST	$2,200	$2,200	07/20/2018	8	4	3	30	30
09958064	**RNTD**	900 Greenwood AVE	$2,500	$2,500	06/07/2018	9	4	2.1	18	18
10068751	**RNTD**	1205 Knollwood RD	$2,750	$2,750	09/30/2018	8	4	2.1	5	5
09961485	**RNTD**	23379 Forest CT	$2,800	$2,700	06/08/2018	7	4	2	8	8
10005539	**RNTD**	657 Chestnut ST	$2,800	$2,700	10/08/2018	8	4	2	98	98
09851508	**RNTD**	143 Willow AVE	$2,850	$2,850	04/14/2018	10	4	2.1	27	27
10031798	**RNTD**	640 Lombardy LN	$2,900	$2,900	08/01/2018	9	4	2.2	5	5
10035462	**RNTD**	1200 Arbor Vitae RD	$2,950	$2,800	09/11/2018	8	4	2.1	40	40
10040791	**RNTD**	1219 Blackthorn LN	$2,999	$3,099	10/01/2018	7	4	2.1	47	477
09941948	**RNTD**	1240 HACKBERRY RD	$3,000	$3,000	05/16/2018	8	4	2.1	10	10
09919297	**RNTD**	1669 LAKE ELEANOR DR	$3,200	$2,900	04/20/2018	10	4	3	4	83
10023409	**RNTD**	855 Brookside LN	$4,000	$3,900	09/01/2018	9	4	4.1	41	41
10033342	**RNTD**	1330 Kenton RD	$4,500	$4,500	09/05/2018	13	4	4.1	12	12
09970718	**RNTD**	1300 Elmwood AVE	$5,000	$5,000	07/15/2018	11	4	4	45	45

Statistics

Total Properties: 14

	Rental Price ($/month)	Rented Price ($/month)	ASF	Beds	Baths	LMT	MT
Minimum	$2,200	$2,200	0	4	2	4	5
Maximum	$5,000	$5,000	3656	4	4.1	98	477
Average	$3,174.93	$3,128.50	2102	4	3	28	64

Sold properties closed averaging 98.54% of their Final List Price (FLP).
This reflects a 1.46% difference between property sale prices and their FLP's.

Affordable Housing Planning and Appeal Act:

2013 Non-Exempt Local Government Handbook

Published in accordance with the 310 ILCS 67 by:
Illinois Housing Development Authority
Office of Housing Coordination Services
December 2013 (Revised January 7, 2014)

Appendix F: 2013 List of AHPAA Non-Exempt Local Governments (Ordinal)

Affordable Housing Planning and Appeal Act:
2013 Report of Non Exempt Local Governments
Ordinal
(determination based on 2011 Annual Community Survey 5-year Estimate)

Count	Place	County	Population	Year-Round Units	Total Affordable Units	Affordable Housing Share
1	Kenilworth	COOK	2565	785	4	0.5%
2	Wayne	DUPAGE	2938	948	5	0.5%
3	Barrington Hills	COOK	3847	1424	9	0.7%
4	Timberlane	BOONE	1160	335	3	1.0%
5	Western Springs	COOK	12747	4125	50	1.2%
6	South Barrington	COOK	4670	1349	18	1.3%
7	Glencoe	COOK	8666	2960	40	1.4%
8	Pingree Grove	KANE	4085	1103	15	1.4%
9	Kildeer	LAKE	3933	1183	18	1.5%
10	Hawthorn Woods	LAKE	7528	2513	40	1.6%
11	Riverwoods	LAKE	3817	1281	22	1.7%
12	Inverness	COOK	7417	2754	48	1.7%
13	Burr Ridge	DUPAGE	10539	3803	82	2.2%
14	Frankfort	WILL	17464	5368	116	2.2%
15	Sugar Grove	KANE	8567	2974	68	2.3%
16	Green Oaks	LAKE	3867	1189	28	2.3%
17	Long Grove	LAKE	7958	2356	55	2.3%
18	Northfield	COOK	5380	2026	50	2.5%
19	Sleepy Hollow	KANE	3378	1143	28	2.5%
20	Winnetka	COOK	12155	3919	100	2.5%
21	Lakewood	MCHENRY	4154	1367	37	2.7%
22	Oak Brook	DUPAGE	7888	2874	80	2.8%
23	Deer Park	LAKE	3225	1158	37	3.2%
24	Tower Lakes	LAKE	1494	506	17	3.3%
25	Homer Glen	WILL	24534	7717	255	3.3%
26	Prairie Grove	MCHENRY	1823	585	21	3.6%
27	Palos Park	COOK	4784	2041	75	3.7%

Count	Place	County	Population	Year-Round Units	Total Affordable Units	Affordable Housing Share
28	Lincolnshire	LAKE	7192	2854	106	3.7%
29	Gilberts	KANE	6303	2062	81	3.9%
30	North Barrington	LAKE	3262	1101	43	3.9%
31	Deerfield	LAKE	18458	6445	259	4.0%
32	Plainfield	WILL	37447	11092	447	4.0%
33	Spring Grove	MCHENRY	5437	1759	71	4.0%
34	Wilmette	COOK	27010	9432	388	4.1%
35	Campton Hills	KANE	10920	3358	139	4.1%
36	Hinsdale	DUPAGE	16545	5373	226	4.2%
37	Northbrook	COOK	32933	11970	522	4.4%
38	River Forest	COOK	11164	3886	172	4.4%
39	Lincolnwood	COOK	12483	4314	197	4.6%
40	Wadsworth	LAKE	3876	1248	60	4.8%
41	Lake Bluff	LAKE	6264	2157	104	4.8%
42	Flossmoor	COOK	9413	3431	168	4.9%
43	Bull Valley	MCHENRY	1082	427	22	5.0%
44	Geneva	KANE	21550	7484	386	5.2%
45	Olympia Fields	COOK	4750	2020	106	5.2%
46	Lake Forest	LAKE	19308	6650	370	5.6%
47	Naperville	DUPAGE	141401	48021	3011	6.3%
48	Park Ridge	COOK	37272	13746	894	6.5%
49	Bannockburn	LAKE	1549	269	18	6.7%
50	Highland Park	LAKE	29983	11473	773	6.7%
51	Cary	MCHENRY	18236	5886	407	6.9%
52	Third Lake	LAKE	1367	447	33	7.4%
53	Glenview	COOK	44134	16002	1183	7.4%
54	Algonquin	MCHENRY	29731	10103	784	7.8%
55	Morton Grove	COOK	23070	8277	651	7.9%
56	Palos Heights	COOK	12332	4886	387	7.9%
57	Oswego	KENDALL	29174	9411	767	8.2%
58	Barrington	COOK	10636	3969	327	8.2%
59	Johnsburg	MCHENRY	6328	2267	188	8.3%
60	Port Barrington*	LAKE	1675	591	53	8.9%
61	Bartlett	DUPAGE	40583	13566	1209	8.9%
62	Lake Barrington	LAKE	4852	2234	205	9.2%
63	Oakwood Hills	MCHENRY	2107	796	73	9.2%
64	Elmhurst	DUPAGE	43934	15505	1447	9.3%

Count	Place	County	Population	Year-Round Units	Total Affordable Units	Affordable Housing Share
65	La Grange	COOK	15487	5332	499	9.4%
66	Fox River Grove	MCHENRY	4722	1571	149	9.5%
67	Elburn	KANE	5461	1659	161	9.7%
68	New Lenox	WILL	24190	8012	778	9.7%

Note: This (January 7, 2014) update corrects the previously published 2013 Non-Exempt Local Governments list which erroneously included "rental units not paying rent" in the total "year-round units". A correction for Median Household Income for one community was also made (*). No additional local governments were added to this 2013 Non-Exempt Local Governments list. However, change in affordable units and affordable housing shares did occur.