



REPORT TO PLANNING COMMISSION City of Sacramento

9

915 I Street, Sacramento, CA 95814-2671

PUBLIC HEARING
October 28, 2010

To: Members of the Planning Commission

Subject **Wolf Ranch Inclusionary Housing Plan Amendment (P10-064)**

A request to amend an approved Inclusionary Housing Plan for an existing condominium development in the Multi Family Residential (R-2B-PUD) zone, within the Laguna Meadow Planned Unit Development (PUD) area.

- A. **Environmental Determination:** Categorical Exemption under CEQA Guidelines Section 15301;

- B. **Inclusionary Housing Plan Amendment** to modify an approved Inclusionary Housing Plan to accommodate the residential project to be occupied as for rent or for sale units.

Location/Council District

7200 Jacinto Ave, Sacramento, CA 95823

Assessor's Parcel Number: 117-0140-042-0000

Council District 8

Recommendation

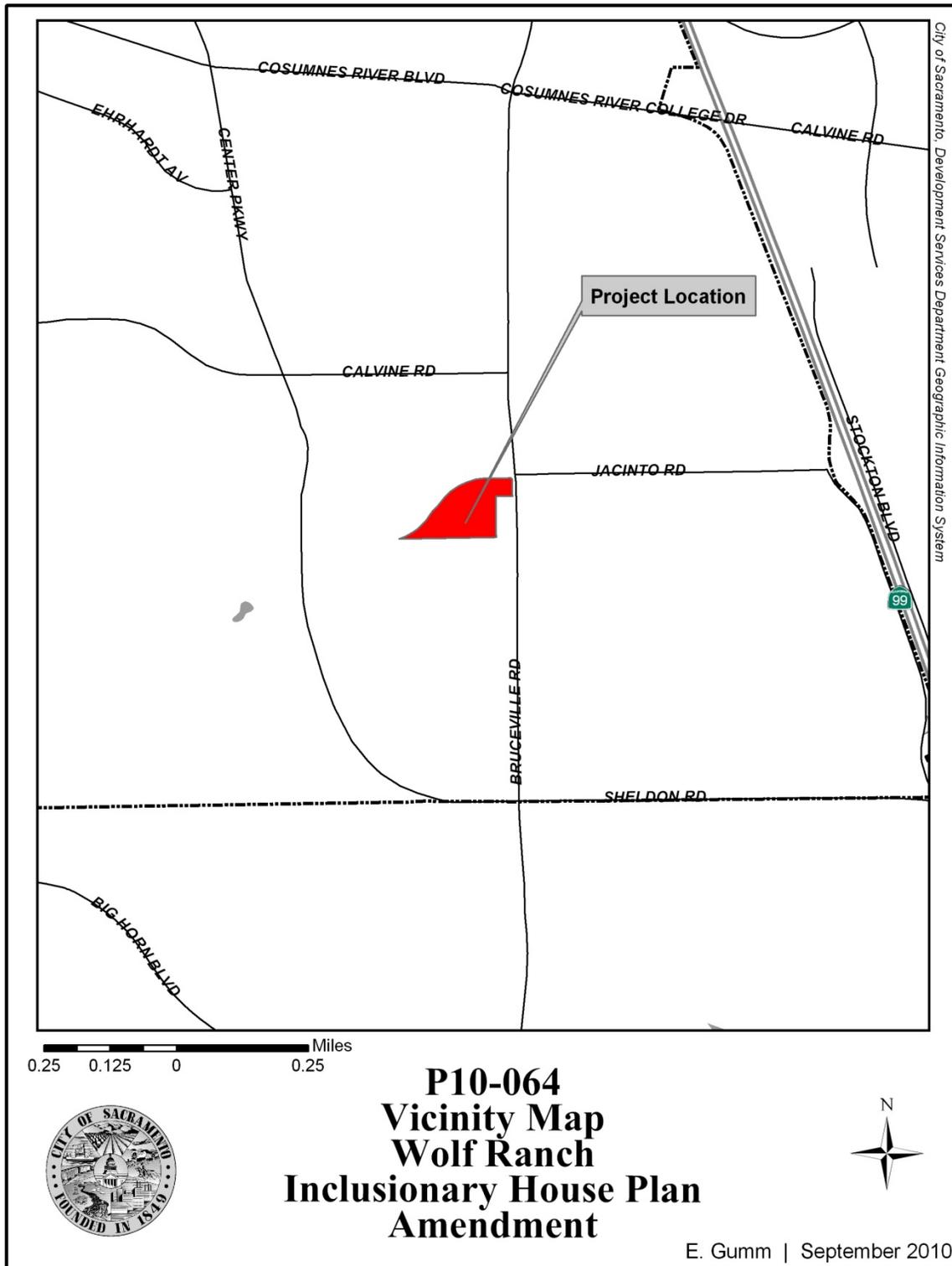
Staff recommends the Planning Commission approve the **Inclusionary Housing Plan Amendment** request based on the findings and subject to the conditions listed in Attachment 1. The Planning Commission has final approval authority over items A-B above, and its decision is appealable to City Council. **Staff is not aware of any issues and the project is considered non-controversial.**

Staff Contact Elise Gumm, LEED AP, Associate Planner, (916) 808-1927;
Lindsey Alagozian, Senior Planner, (916) 808-2659

Applicant Wolf Ranch, LLC, c/o: Kenneth V. Stevens, (925) 362-1442
156 Diablo Road, Suite 300, Danville, CA 94526

Owner Wolf Ranch, LLC, c/o: Kenneth V. Stevens, (925) 362-1442
156 Diablo Road, Suite 300, Danville, CA 94526

Vicinity Map



Summary

The Wolf Ranch Condominium Project began construction in 2006 and the current owner purchased the property out of foreclosure and completed the project in 2008. The development consists of 160 residential condominium units situated in a total of 17 buildings, in addition to a separate clubhouse building. The project was approved and built as condominium units and was ready to sell. However, due to the declining housing market, all units were rented out. The original Wolf Ranch Inclusionary Housing Plan as adopted on March 13, 2006, is for a for-sale condominium project and the applicant is requesting to rent the units and thereby modify the Inclusionary Housing Plan to reflect this change. The applicant indicates that the units will be rented only until the housing market improves and the units can then be sold. No physical changes to the project site are proposed, except the property owner has agreed to install a security camera system to monitor primary entry points and common areas, per the City’s Police Department’s recommendation.

Staff notified all property owners within 1,000 feet of the site for this public hearing and received no opposition at the time of writing of this report. Staff finds that the proposal is consistent with the applicable policies of the General Plan and City’s housing policies.

Table 1: Project Information	
General Plan designation:	Suburban High Density Residential
Existing zoning of site:	R-2B-PUD (Multi-Family PUD zone)
Existing use of site	Multi-Family Residential
Property area:	8.83± acres

Background Information

On March 23, 1988, the City Council approved the necessary entitlements to establish the Laguna Meadows Planned Unit Development. This approval included the subject site and designated the site for multi-family development. There were two applications submitted in 1989 and 1997 (P89-290 & P97-042), respectively, to construct an apartment complex on the subject site, but both applications were withdrawn.

On March 24, 2005, the Planning Commission approved a Tentative Map and a Special Permit to allow the development of a 160 unit condominium complex on the subject site (P04-174). Construction activities were started right after the entitlement approval but the construction ceased in 2007. The current owner purchased the property out of foreclosure and resumed the construction and completed the project in 2008. Due to the housing market, the owner had to rent out the units after the construction to avoid the property becoming a blighted site. In 2009, the developer requested they be allowed to rent the units for a limited period of time until the market recovered. Due to the changes of a for-sale condominium project to a temporary for-rent apartment, the adopted inclusionary housing plan needed to be amended to reflect the units as for rent, until the units eventually could be sold in the future. Sacramento Housing and Redevelopment Agency (SHRA) drafted an Amended Inclusionary Housing Plan and an

Amended Inclusionary Housing Agreement allowing the owner to temporarily rent the property for a two year period. It was determined that no amendments to the entitlements were necessary for this temporary accommodation and an Amended Inclusionary Housing Agreement was recorded in September of 2009. In winter of 2010, Wolf Ranch requested the ability to rent the units for a longer duration than had been approved in the Amended Inclusionary Agreement. It was determined that this action required an amendment to the projects entitlements. The proposed project is to adopt Amended Inclusionary Housing Plan to reflect the longer term, and the affordable housing provision regarding rental units. The property owner is also required to review the Inclusionary Housing Plan with SHRA every five years, to ensure the Plan remains appropriate for the project, until the property can be sold out as condominiums.

Public/Neighborhood Outreach and Comments

The Planning Commission meeting was noticed to all property owners within a 1,000 foot radius of the subject site and the site was posted. On September 30, 2010, the applicant presented the project at the North Laguna Creek Neighborhood Community Meeting and answered many questions from the neighbors. Staff was in attendance and observed that there was no opposition to the proposed Inclusionary Housing Plan Amendment after hearing the presentation by the applicant. At the time of writing of this report, staff has not received any comments, and staff is not aware of any opposition to the project.

Environmental Considerations

The Community Development Department, Environmental Planning Services Division has reviewed this project and determined that this is exempt from the provisions of the California Environmental Quality Act (CEQA) Section 15301, Existing Facilities. The project consists of the minor alteration of existing private structures, involving no expansion of use beyond that existing.

Policy Considerations

General Plan

The General Plan designates the project site as Suburban High Density Residential. This designation provides for single-use multi-family housing and predominantly residential mixed-use development in areas served by major transportation routes and facilities, and near major shopping areas, including multi-family dwellings (e.g., apartments and condominiums), mixed-use neighborhood-serving commercial, and compatible public special uses. Therefore, the existing condominium multi-family residential project is consistent with the General Plan designation and the applicable policies.

Project Design

The approximately 9 gross acre condominium project is located on the southwest corner of Bruceville Road and Jacinto Road, within the proximity to the Cosumnes River Community College and the city limit of Elk Grove. The complex consists of 160 residential condominium units situated in a total of 17 buildings, together with a

separate clubhouse building. There are three basic building types: an 8-Plex Plan, a 9-Plex Plan, and a 12-Plex Plan. Forty residential units are situated in five of the 8-Plex Plan buildings, seventy-two residential units in eight of the 9-Plex Plan buildings, and forty-eight residential units in four of the 12-Plex Plan buildings. The 8-Plex Plan and 9-Plex Plan buildings have two floors, and the 12-Plex Plan buildings have three floors.

The construction of the condominium project was completed in 2008. Currently, more than 90% of the units are rented out, and all amenities on site are fully functional. The proposed entitlement will not physically modify the site design or building elevations, except that the property owner has agreed to install a security camera system to accommodate the requirements from the City's Police Department. Security cameras will be installed at the main entrance / exit points, the tot lot areas and clubhouse, and within the parking lot. A security plan showing the location of the security cameras is contained in the staff report as Attachment 1, Exhibit B, and staff has included them as conditions of approval.

Inclusionary Housing Plan Amendment

The project is required to provide an Inclusionary Housing Plan based on its location in a new growth area. The original Inclusionary Housing Plan adopted in 2006 proposed 10% of the units (16 units) to be designated for low income households and 5% of the units (8 units) to be designated for very low income households. A total of 24 units were restricted to comply with the Mixed Income Housing Ordinance. The units were dispersed throughout the site and constructed of the same materials as the other market-rate units.

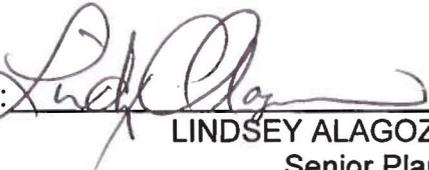
Due to the market downturn, the property owner has not been able to market the existing units as for-sale units and has requested the ability to rent the units until the housing market improves. The request to rent the units makes the project subject to the provisions of Section 17.190.030 B of Ordinance, which requires a for-rent residential development to provide five percent (5%) of the residential units affordable to low income households and ten percent (10%) affordable to very low income households.

The Amended Inclusionary Housing Agreement will allow the applicant to keep the rental units and to comply with the rental inclusionary housing requirement up to 30 years. At any point in time the owner can sell the units, which is what the owner desires to do, and the City encourages as soon as the housing market improves. At the time the units are offered for-sale, the owner will coordinate with SHRA to meet the ownership inclusionary housing requirements. The property owner is conditioned to provide advance notification to renters if they decide to sell the units.

The changes of the Inclusionary Housing Plan will not change the total number of inclusionary units, which is still a total of 24 units. The Sacramento Housing and Redevelopment Agency (SHRA) has reviewed the Inclusionary Housing Plan and found it consistent with the Ordinance. Exhibit A is the Amended Inclusionary Housing Plan and is intended to implement the inclusionary requirement for the project. The owner and SHRA will execute an Amended Inclusionary Housing Agreement and record it

against all the Inclusionary Housing Units when the entitlement process is final. Periodic reviews on the Inclusionary Housing Plan are required, and the property owner is conditioned to be in compliance with the Inclusionary Housing Plan and the Agreement.

Respectfully submitted by: 
ELISE GUMM, LEED AP
Associate Planner

Approved by: 
LINDSEY ALAGOZIAN
Senior Planner

Recommendation Approved:

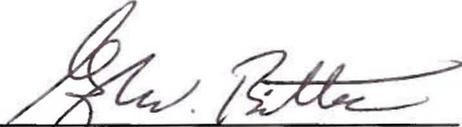

GREG BITTER, AICP
Principal Planner

Table of Contents:

Staff Report		Page 1
Attachment 1	Recommended Findings and Conditions	Page 8
Exhibit A	Inclusionary Housing Plan	Page 10
Attachment 2	Vicinity Map	Page 20
Attachment 3	Land Use and Zoning Map	Page 21

Attachment 1 Recommended Findings of Fact and Conditions of Approval

Findings of Fact

A. Environmental Determination: Exemption

Based on the determination and recommendation of the City's Environmental Planning Services Manager and the oral and documentary evidence received at the hearing on the Project, the Planning Commission finds that the Project is exempt from review under Section **15301, Existing Facilities** of the California Environmental Quality Act Guidelines as follows:

The project consists of the minor alteration of existing private structures, involving no expansion of use beyond that existing.

B. Inclusionary Housing Plan Amendment to modify an approved Inclusionary Housing Plan to accommodate the residential project to be occupied as for rent or for sale units, is approved subject to the following Findings of Fact:

1. The Amendment is necessary to facilitate the development, the use of the project site, and to account for the different financing and funding environments, economies of scale, and infrastructure needs.
2. The Amendment is consistent with the provisions of Title 17, Chapter 17.190, and it will not inhibit the City's ability to enforce compliance with this chapter.

Conditions of Approval

B. Inclusionary Housing Plan Amendment to modify an approved Inclusionary House Plan to accommodate the existing residential condominium project to be used as an apartment for a period of time is hereby approved subject to the following conditions of approval:

PLANNING

- B1. The applicant shall comply with the Inclusionary Housing Plan and the Inclusionary Housing Agreement as approved by the Sacramento Housing Redevelopment Agency (SHRA).
- B2. Location of inclusionary units shall conform to the approved plan as shown in the Amended Inclusionary Housing Plan, Exhibit A.
- B3. The applicant/owner shall provide notice to all prospective tenants that the units could be for sale when the housing market improves. This shall be accomplished

through a written notice, which indicates that the tenants may be asked to move from their units. In addition, the notice shall inform the prospective tenants that, as a condition of renting in this complex, they will not be eligible for any relocation or other benefits under City Code Chapter 17.192.

- B4. The applicant/owner shall give written notification to tenants 60 days in advance if their units are for sale.
- B5. Any modification to the project shall be subject to review and approval by Planning and additional entitlements may be required.

POLICE DEPARTMENT

- B6. Closed-circuit color video cameras shall be employed to monitor the primary point (1) of entry for vehicles, primary two (2) points of entry for pedestrians onto the property, two points (2) at the tot-lot play areas with the community center, and two points (2) at the parking lot areas.
- B7. The recording device shall be a digital video recorder (DVR) capable of storing a minimum of 7 days worth of activity. A DVR capable of storing 30 days worth of activity is greatly preferred.
- B8. The DVR must be kept in a secured area that is accessible only to management.

Advisory Notes

- B9. Television-style monitors are recommended in staff areas, so that staff can clearly see the activities occurring in the monitored areas of the complex.
- B10. Signs that say the property is monitored by video surveillance are recommended at the primary points of entry for vehicles and pedestrians.

WOLF RANCH CONDOMINIUMS PROJECT**Inclusionary Housing Plan****March 24, 2005****1st Amendment: March 13, 2006****2nd Amendment: July 23, 2009****Third Amendment: October 18, 2010****Amendment**

The Wolf Ranch Inclusionary Housing Plan as adopted on March 13, 2006, amended in July 23, 2009, and is hereby amended again to reflect the Project's condominium units will be rented until the units are to be sold.

Wolf Ranch, LLC, the new owner, purchased the property out of foreclosure from the previous owner, Costa Communities, Inc./Bruceville 160, LLC.

The owner will be required to adhere to the rental provisions of the City's Mixed Income Housing Ordinance as outlined in the Inclusionary Housing Regulatory Agreement while the Project units are rented. Upon sale of the units, the Owner will be required to adhere to the for-sale condominium provisions of the City's Mixed Income Housing Ordinance, as also outlined in the Inclusionary Housing Regulatory Agreement.

Proposed Project

Wolf Ranch, LLC, (the "Owner") is the owner of certain real property in the City of Sacramento on which has been developed and constructed the Wolf Ranch Condominiums Project (the "Project"), a residential condominium community. The approximately 9 ± gross acre project is located on the southwest corner of Bruceville Road and Jacinto Road, approximately midway between Cosumnes River Blvd on the North and Sheldon Road on the South. The Project consists of 160 residential condominium units situated in a total of 17 buildings, together with a separate clubhouse building. There are three basic building types: an 8-Plex Plan, a 9-Plex Plan, and a 12-Plex Plan. Forty residential units are situated in five of the 8-Plex Plan buildings, seventy-two residential units in eight of the 9-Plex Plan buildings, and forty-eight residential units in four of the 12-Plex Plan buildings. The 8-Plex Plan and 9-Plex Plan buildings have two floors, and the 12-Plex Plan buildings have three floors.

Mixed Income Housing Policy

The Project site is subject to the City's Mixed Income Housing Policy, adopted in the City of Sacramento Housing Element and required by the City's Mixed-Income Housing Ordinance, City of Sacramento City Code Section 17.190 ("Ordinance"). The project was initially entitled as a condominium project and accordingly was subject to Section 17.190.065 of the Ordinance, which permits exclusively for-sale multi-family developments of 200 units or less in size to provide five percent (5%) of the residential

units affordable to very low income households and ten percent (10%) affordable to low income households if they are provided on-site and for-sale (collectively the "Inclusionary Requirement" and "Inclusionary Units"). Due to the market downturn, the Owner has been unable to market the project's existing units as for-sale units and has requested the ability to rent its units until it is able to sell the units. Despite the Project's entitlements, the request to rent the units makes the Project subject to the provisions of Section 17.190.030 B of Ordinance, which requires a development provide five percent (5%) of the residential units affordable to low income households and ten percent (10%) affordable to very low income households.

Pursuant to the City Code Section 17.190.110 (B), the initial Inclusionary Housing Plan ("Plan") must be approved prior to or concurrent with the approval of legislative or adjudicative entitlements for the Project. City Code Section 17.190.030 sets forth the number, unit mix, location, structure type, affordability and phasing of the Inclusionary Units in the Project. This document constitutes the Amended Plan, and, is intended to implement the Inclusionary Requirement for the Project. All future approvals for the Project shall be consistent with this Inclusionary Housing Plan.

The Inclusionary Requirement for the Project is set forth in more detail in the Inclusionary Housing Agreement executed by developer/owner and the Sacramento Housing and Redevelopment Agency ("SHRA") and recorded against all the Inclusionary Housing Units. This amendment to Inclusionary Housing Agreement shall be executed and recorded immediately following the amendment to the Inclusionary Plan for the residential condominium subdivision. The Inclusionary Housing Agreement will describe with particularity the site and income and sales/rental restrictions for the construction and financing of the Inclusionary Units, pursuant to City Code Section 17.190.110 (C). The Inclusionary Housing Agreement shall be consistent with this Plan.

Number of Inclusionary Units

While the Project is rented, the Owner, or its successors and assignees, shall regulate or cause to be regulated a number of dwelling units affordable to Very Low Income Households ("Very Low Income Units") and Low Income Households ("Low Income Units") as defined in the Sacramento City Code Section 17.190.030, equal to five percent (10%) and ten percent (5%) of the total number of housing units in the Project, respectively.

Based on the current proposal to rent the 160 units in the Project, the Inclusionary Requirement for the Project is 16 Very Low Income Units (10%) and 8 Low Income Units (5%).

Total Number of Residential Units within Project:		160 Units
Very Low Income Units:	10%	16 Units
Low Income Units:	5%	8 Units

Exhibit A Inclusionary Housing Plan

Total Number of Inclusionary Units: 24 Units

Upon notification of the Owner to SHRA that the Project is prepared for sale, the Project's Inclusionary obligation will revert back to the provisions under Section 17.190.065 of the Ordinance which permits exclusively for-sale multi-family developments of 200 units or less in size to provide: five percent (5%) of the residential units affordable to very low income households and ten percent (10%) affordable to low income households if they are provided on-site and for-sale.

Total Number of Residential Units within Project: 160 Units

Very Low Income Units: 5% 8 Units

Low Income Units: 10% 16 Units

Total Number of Inclusionary Units: 24 Units

Units by Type and Tenure

During the rental period, Owner will offer twenty-four (24) total units as for rent inclusionary units for the term of the Inclusionary Agreement. When Owner notifies the SHRA that a sale of the units will take place, the rental restrictions will revert to for-sale restrictions as outlined above.

When a unit is sold, the party who initially purchases a for-sale inclusionary unit shall occupy that unit as their principal residence. SHRA will record a regulatory agreement against each inclusionary unit. The regulatory agreement will detail the recapture difference between the market sales price and the affordable price (adjusted for inflation) if the home is resold to a non-income qualified buyer in the future.

Size and Bedroom Count

During the rental period, there shall be a mix of 1 and 2 bedroom units amongst the affordable units. The eight (8) low income rental units shall be a combination of 2 bedroom/1.5 bathroom units and 2 bedroom/2 bathroom units, with the sixteen (16) very low income for-sale units being a combination of 1 bedroom/1 bathroom units, 2 bedroom/1.5 bathroom units and 2 bedroom/2 bathroom units.

Affordability Level	Number of Units	Unit Type	Approx. Unit Size
Low Income	0	1 bd / 1 bath	867 Sq. Ft.
Very Low Income	9	1 bd / 1 bath	867 Sq. Ft.
Low Income	7	2 bd / 1.5 bath	1091 – 1106 Sq. Ft.
Very Low Income	6	2 bd / 1.5 bath	1091 – 1106 Sq. Ft.
Low Income	1	2 bd / 2 bath	1012 Sq. Ft.
Very Low Income	1	2 bd / 2 bath	1012 Sq. Ft.

Exhibit A Inclusionary Housing Plan

If the owner notifies the SHRA that the units will be sold, the project's Inclusionary Obligation will transition from a rental obligation to a for-sale condominium obligation as noted earlier in the plan. There will be a mix of 24, 1 and 2 bedroom units sold at affordable prices. The sixteen (16) low income for-sale units shall be a combination of 1 bedroom/ 1 bathroom units, 2 bedroom/ 1.5 bathroom units and 2 bedroom/2 bathroom units, with the eight (8) very low income for-sale units being 1 bedroom/ 1 bathroom units, 2 bedroom/1.5 bathroom units and 2 bedroom/2 bathroom units.

Affordability Level	Number of Units	Unit Type	Approx. Unit Size
Very Low Income	3	1 bd / 1 bath	867 Sq. Ft.
Low Income	8	1 bd / 1 bath	867 Sq. Ft.
Very Low Income	4	2 bd / 1.5 bath	1091 – 1106 Sq. Ft.
Low Income	7	2 bd / 1.5 bath	1091 – 1106 Sq. Ft.
Very Low Income	1	2 bd / 2 bath	1012 Sq. Ft.
Low Income	1	2 bd / 2 bath	1012 Sq. Ft.

Location of Inclusionary Units within Project

Inclusionary Units shall be located on-site within the proposed development area of the Wolf Ranch Condominiums Project as part of the multi-family residential condominium development.

Inclusionary Units will be dispersed throughout the Project in the 12-Plex Plan and 8-Plex Plan buildings as depicted in the attached Exhibit "A-1" and as referenced in the attached Exhibit "A-2". The Inclusionary Units are geographically distributed throughout the Project and located so that the ratio of Inclusionary Units to market rate units is substantially consistent among phases of the Project. The location of the Inclusionary Units within the Project is subject to Amendment, consistent with City Code Section 17.190.110 B (1).

Affordability Requirements

While the units are rented they will meet the requirements of City Code Section 17.190.030 regarding number and affordability of units, their location, timing of development, unit sizes, exterior appearance and development standards. The rental units will be available to low and very low income households. Family size for affordable rental units shall be determined in accordance with the regulations of the California Tax Credit Allocation Committee. Monthly Affordable Rents (including utility allowances) of the Inclusionary Units shall be restricted to Low and Very Low Income Households. A unit whose occupancy is restricted to a Very Low Income Household has a monthly rent that does not exceed one-twelfth of thirty percent (30%) of fifty percent (50%) of the Sacramento area median income, adjusted for family size. A unit whose occupancy is restricted to a Low Income Household has a monthly rent that does not exceed one-twelfth of thirty percent (30%) of eighty percent (80%) of the Sacramento area median income, adjusted for family size. Median income figures are those published annually by

Exhibit A Inclusionary Housing Plan

the United States Department of Housing and Urban Development. With respect to each Inclusionary Unit, the affordability requirements of this Plan shall continue for no less than thirty (30) years from the recordation of the notice of completion of the Residential Project.

If the units are sold, sale and occupancy of the “for-sale” Inclusionary Units shall be restricted to households with incomes, at the time of initial occupancy, that do not exceed eighty percent (80%) of the median income for Sacramento County, adjusted for actual household size for Low Income households and fifty percent (50%) of the median income for Sacramento County, adjusted for actual household size for Very Low Income households. Median income figures are those published annually by the United States Department of Housing and Urban Development.

The sales price of the “for-sale” Inclusionary Housing Units will be set so that Low and Very Low Income households can qualify for the purchase of the Units. The sales price will be set such that no more than thirty-five percent (35%) of the gross annual household income of the Low and Very Low Income household groups will be allocated to housing costs. As part of the Inclusionary Housing Agreement, SHRA will provide the Owner with a schedule of maximum sales prices affordable to these income ranges. These maximum sales prices shall be adjusted annually to reflect the median income figures in effect at the time individual “for-sale” Inclusionary Units are sold.

Sales prices of the “for-sale” Inclusionary Units will be outlined in the Inclusionary Housing Agreement. The Units will be sold initially at an affordable housing price to Low and Very Low Income households first-time homebuyer. An SHRA 30-year note will govern the Inclusionary Unit’s resale, allowing SHRA one hundred and twenty (120) days to refer an income-eligible buyer after notification of the owner’s intent to sell. If an income-eligible buyer is not found, the home may be resold at market price to a household that is not low income, provided that SHRA recaptures the difference between the home’s market value and its affordable housing price and a portion of the appreciation of the home, as well as recapture other City or SHRA contributions. The low or very low income owner-occupant will receive his or her initial equity in the home and a portion of the home’s appreciated value. The terms of this arrangement are outlined in the SHRA Guidelines for the sale of Inclusionary Housing.

The Owner will be allowed to rent the Inclusionary Housing Units on an interim basis prior to the sale of those units subject to the terms and conditions outlined in the Inclusionary Housing Regulatory Agreement. Monthly affordable rents (including utility allowances) and occupancy of the Inclusionary Units during the interim rental period shall be restricted to households with incomes that do not exceed fifty percent (50%) of the median income for Sacramento County, adjusted for actual household size for Very Low Income households and eighty percent (80%) of the median income for Sacramento County adjusted for actual household size for Low Income households. Median income figures are those published annually by the United States Department of Housing and Urban Development.

Exhibit A Inclusionary Housing Plan

The rental rate of the units will be set so that no more than thirty percent (30%) of the gross annual household income of the given income group (including an allowance for utility payments) will be allocated to housing costs.

Incentives

The Owner or builder may seek incentives, assistance, or subsidies pursuant to City Code Section 17.190.040. One such incentive is the allowance for fee waivers and/or deferrals for those units fulfilling the Inclusionary Requirement. The Owner will work with the City to determine the fee reductions and other incentives available.

Marketing

The Owner shall be required to market Inclusionary Units in the same manner as non-Inclusionary Units. Such marketing activities may include newspaper and internet advertisements, toll free project information numbers, and on or off-site project signage.

In addition, the Owner shall make Inclusionary Housing information available in the on-site sales office.

Phasing of Development of the Inclusionary Units

The Inclusionary Units shall be rented concurrently with the other market rate units in the Project, as may be further defined in Sacramento City Code Section 17.190.030(D). The nature of the concurrency is defined by a series of linkages between the market rate units and the Inclusionary Units.

Market Rate Housing/Inclusionary Unit Linkages

The following describes the relationship of market rate rental activity to the Inclusionary Unit rental activity. These milestones are outlined to ensure that the rental of affordable units occurs concurrent with rental of market rate units:

- A. The Inclusionary Housing Plan shall be approved in advance of the second amendment to the Inclusionary Housing Agreement.
- B. Marketing of inclusionary units within the Project shall occur concurrently with the marketing of market rate units.

Additional Restriction Associated with Rental Approval

Due to the fact that the project will be rented for an unspecified period of time which is inconsistent with the Project's entitlements, the project will be subject to the following additional requirements:

- C. SHRA must approve the Project's property management company in advance of the recordation of the Inclusionary Agreement

EXHIBIT "A-1"

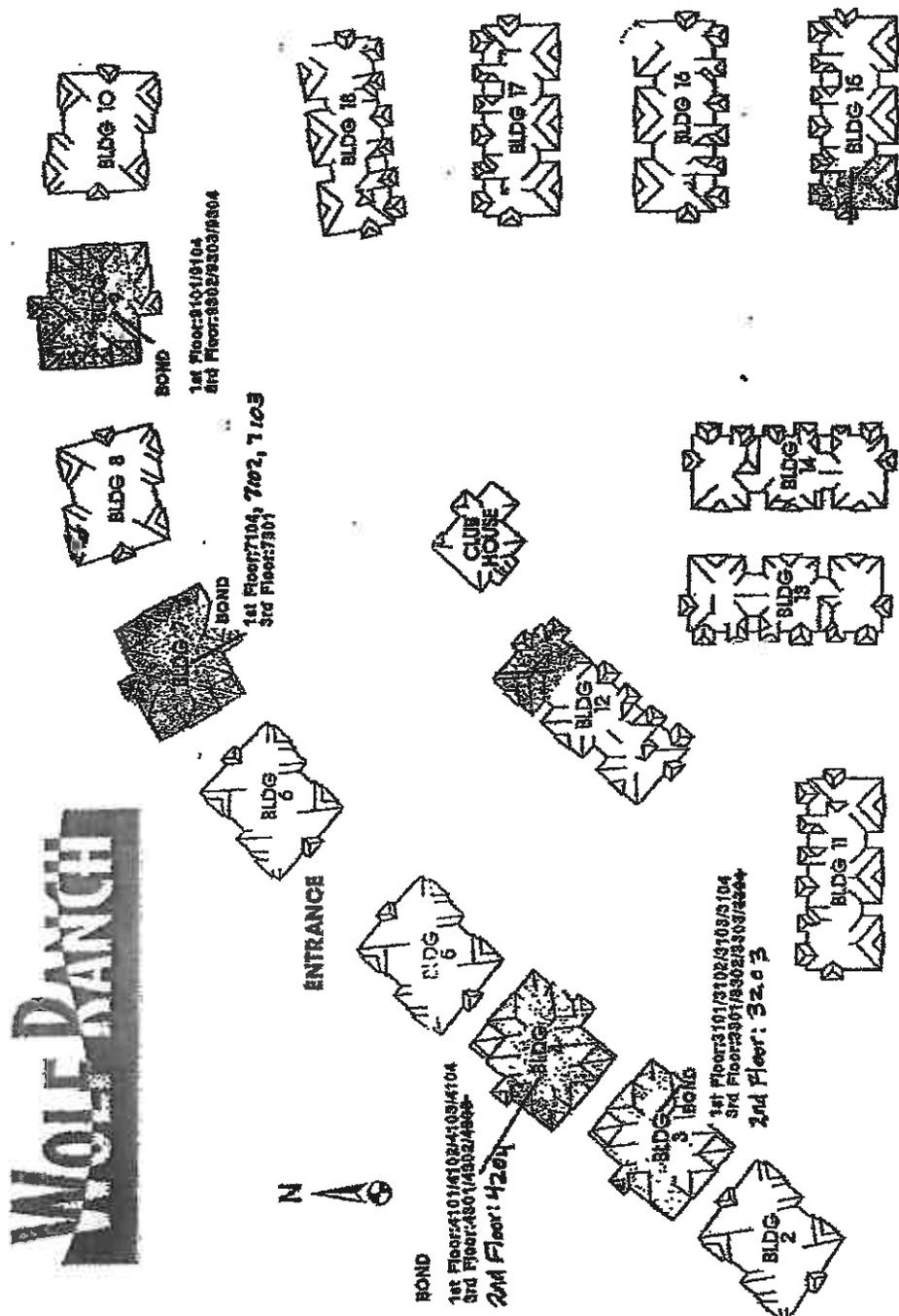


EXHIBIT "A-2"

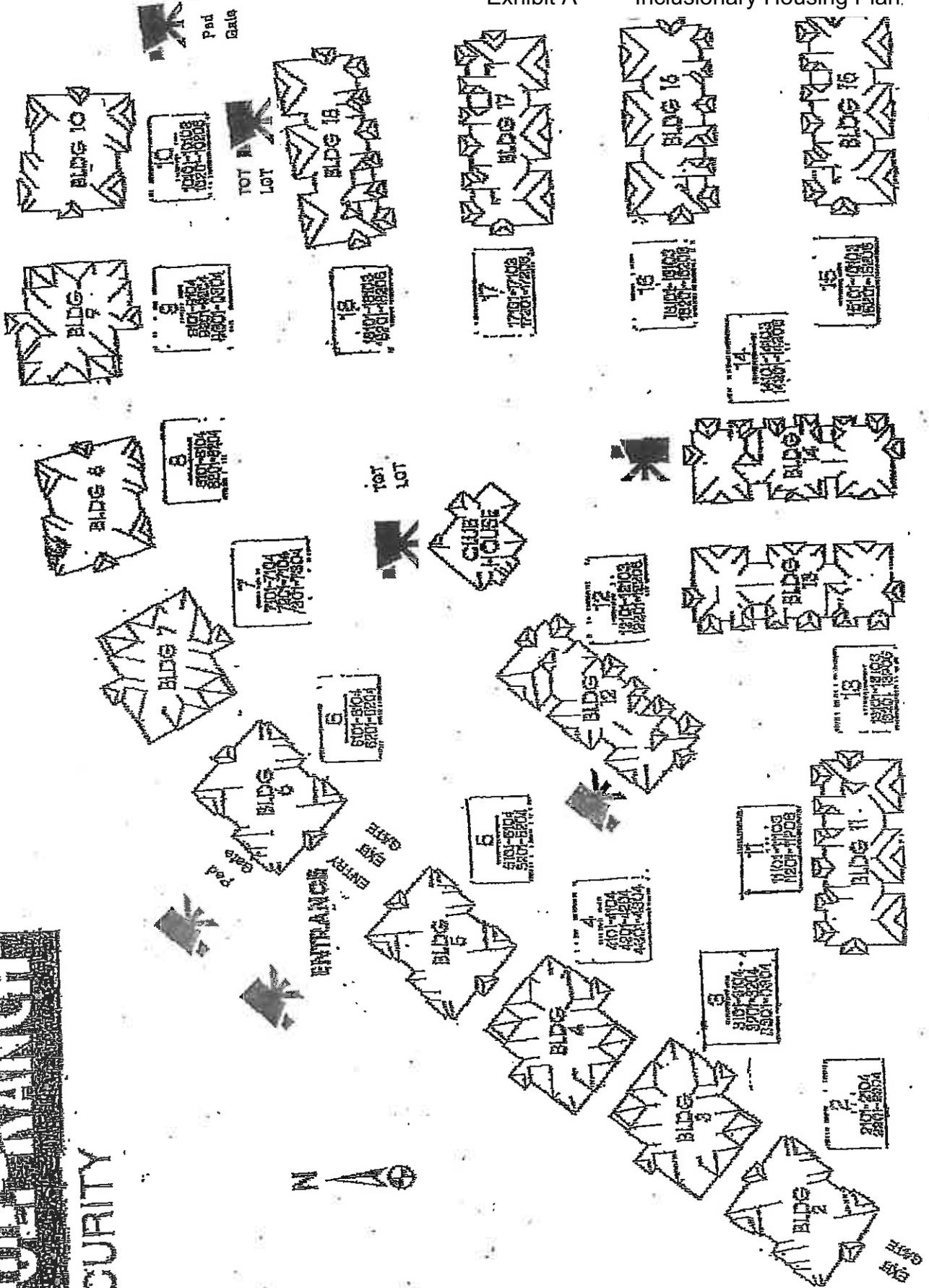
Wolf Ranch
Inclusionary Housing Unit Mix

<u>Address</u>	<u>Bldg</u>	<u>Plex</u>	<u>Floor</u>	<u>B/B</u>	<u>Type</u>	<u>Floorplan</u>
3101	3	12	1	2x1.5	Low	Chestnut
3102	3	12	1	2x1.5	Very Low	Chestnut
3103	3	12	1	2x1.5	Low	Chestnut
3104	3	12	1	2x1.5	Very Low	Chestnut
3203	3	12	2	2x2	Low	Sundance
3301	3	12	3	1x1	Very Low	Sierra
3302	3	12	3	1x1	Very Low	Sierra
3303	3	12	3	1x1	Very Low	Sierra
4101	4	12	1	2x1.5	Low	Chestnut
4102	4	12	1	2x1.5	Low	Chestnut
4103	4	12	1	2x1.5	Very Low	Chestnut
4104	4	12	1	2x1.5	Very Low	Chestnut
4204	4	12	2	2x2	Very Low	Sundance
4301	4	12	3	1x1	Very Low	Sierra
4302	4	12	3	1x1	Very Low	Sierra
7102	7	12	1	2x1.5	Low	
7103	7	12	1	2x1.5	Low	Chestnut
7104	7	12	1	2x1.5	Very Low	Chestnut
7301	7	12	3	1x1	Very Low	Sierra
9101	9	12	1	2x1.5	Low	Chestnut
9104	9	12	1	2x1.5	Very Low	Chestnut
9302	9	12	3	1x1	Very Low	Sierra
9303	9	12	3	1x1	Very Low	Sierra
9304	9	12	3	1x1	Very Low	Sierra

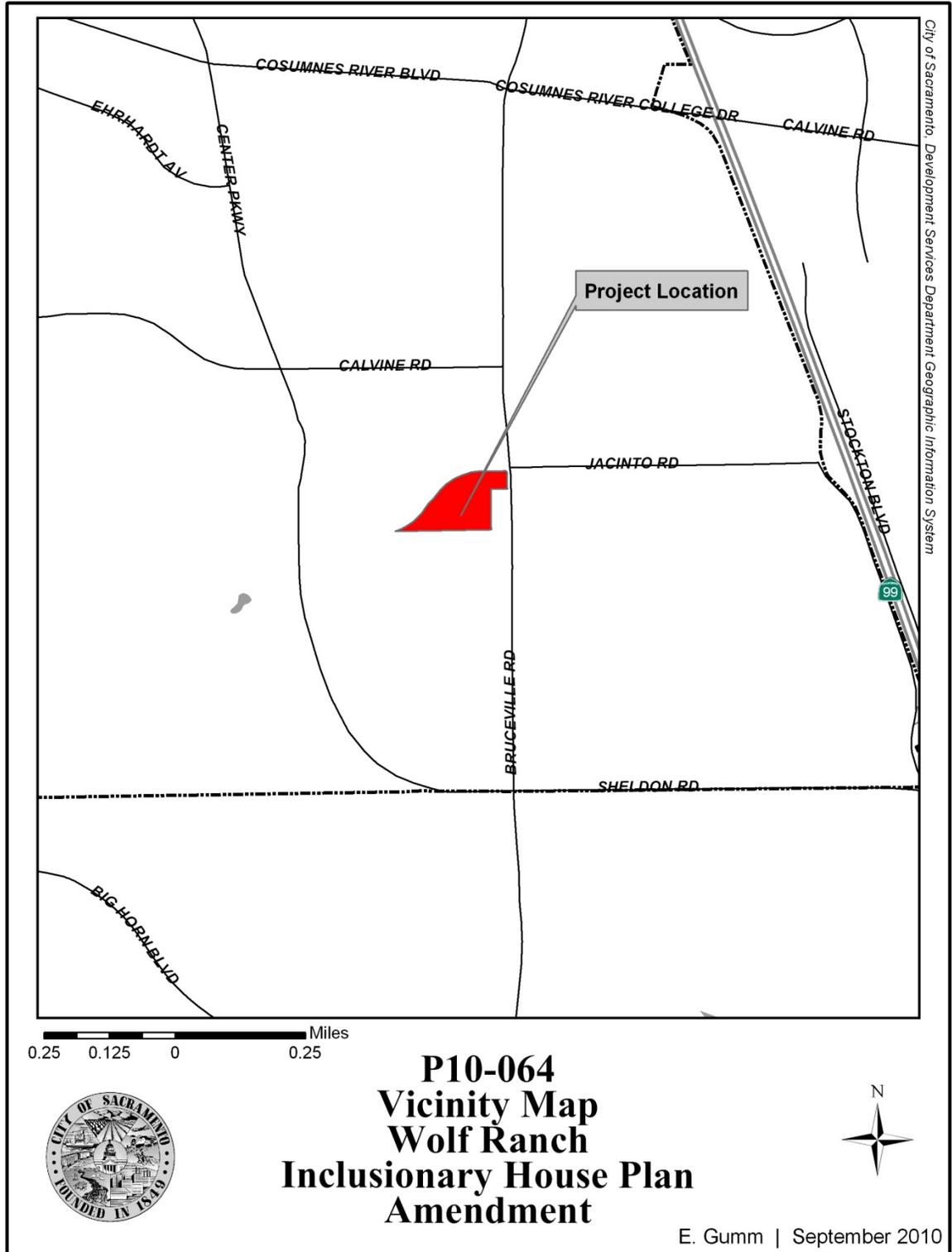
Exhibit A

Inclusionary Housing Plan

WOLF RANCH SECURITY



Attachment 2 Vicinity Map



Attachment 3 Land Use and Zoning Map

