

DAVID H. J. AMBROZ
PRESIDENT

RENEE DAKE WILSON
VICE-PRESIDENT

ROBERT L. AHN
CAROLINE CHOE
RICHARD KATZ
JOHN W. MACK
DANA M. PERLMAN
MARTA SEGURA

JAMES K. WILLIAMS
COMMISSION EXECUTIVE ASSISTANT II
(213) 978-1300



ERIC GARCETTI
MAYOR

MICHAEL J. LOGRANDE
DIRECTOR
(213) 978-1271

LISA M. WEBBER, AICP
DEPUTY DIRECTOR
(213) 978-1274

JAN ZATORSKI
DEPUTY DIRECTOR
(213) 978-1273

FAX: (213) 978-1275

INFORMATION
<http://planning.lacity.org>

June 4, 2015

Honorable Gil Cedillo, Chair
Housing Committee
Los Angeles City Council
200 North Spring Street, Room 395
Los Angeles, CA 90012

Attention: Richard Williams, Legislative Assistant
Attention: Sharon Gin, Legislative Assistant

COMMITTEE TRANSMITTAL: REPORT BACK RELATIVE TO UNAPPROVED DWELLING UNITS - OPTIONS FOR PRESERVATION. COUNCIL FILE 14-1150

Dear Honorable Members Housing Committee:

The Department of City Planning (DCP) is pleased to present this report in response to the December 16, 2014 City Council adoption of the motion by Councilmember Fuentes (CF 14-1150) regarding options for preserving existing unapproved units in multifamily buildings. The report includes a review of what steps other jurisdictions have taken to preserve non-permitted units and presents a range of planning and land use options that the City can consider to facilitate the process.

Summary

Los Angeles likely has thousands of units that were established without building permits. If the units were not permitted, the City cannot verify the life and safety standards of these units, nor establish whether the units are allowed under the zoning code. Tenants living in units that were not permitted may be put at risk and property owners lack the legal/financial security that comes with a legitimate unit.

When non-permitted units are identified by City inspectors today, they are often removed and the tenants are dislocated. In multifamily buildings (the topic of this report), approximately 2,560 non-permitted units were cited by City enforcement agencies during the 2010 to 2015 period (see the accompanying HCIDLA report). The vast majority of these units (1,765) have been removed, while only 201 (or 12%) were able to be legalized by complying with the City's building and zoning regulations. This loss of units is estimated to

have reduced the City's net housing creation during by almost 10% over the time period. Given the housing crisis the City is experiencing, preserving every safe, habitable dwelling unit becomes paramount.

This report will look at what kind of planning and land use strategies could be employed to address the legalization of non-permitted units in multifamily buildings. In most cases this involves just one or two unauthorized units¹. A successful program will ensure there is a viable path for preserving safe, livable units, while respecting the development standards that protect neighborhood character and habitability.

Background

Los Angeles is experiencing a profound housing crisis marked by a severe shortage of affordable housing options. The City has more people paying too much in housing costs than any other city in the country and the mismatch between housing costs and incomes is higher than ever. Low-income renters bear the brunt of the housing shortage, but increasingly the problem has spread to middle-and even upper-income Angelenos, negatively affecting everything from traffic, air quality, jobs, and the quality of life for residents forced to live in overcrowded or unsafe housing conditions.

Addressing the housing crisis necessitates the City to diligently produce and preserve housing, particularly units affordable to low and middle income households. Unapproved units, more commonly known as illegal or bootleg units, likely constitute a considerable portion of Los Angeles' affordable market rate housing stock². Most of these units are believed to exist on single-family lots. A smaller subset exists in multifamily homes - in converted rec rooms, storage rooms or illegally subdivided apartments. These multifamily buildings are the subject of this report.

Unapproved units in multifamily buildings are established in many ways. They may have been built without the benefit of any permits, or may have been built with permits for a different use - such as a storage room or as a subdivided part of a previously larger unit. Sometimes the zoning regulations that stand in the way of a unit being legalized today did not apply when the building was built or the non-permitted unit was created³.

The majority of multiple family units cited for enforcement action are a result of the Systematic Code Enforcement Program (SCEP), administered by the Housing and Community Investment Department (HCIDLA). At the time of enforcement, a property owner is given the option to remove the unit or legalize. A 30 day time period is usually provided to remove the unit or show tangible progress towards legalization.

In multiple family units, SCEP building inspectors report that the major barrier towards legalization is not building code compliance, but more often planning and zoning codes (such as density limits and parking requirements). This is because usually the units often vary little from legal ones as they were carved out of original (permitted) building space.

¹ Complete non-residential buildings that have been converted to housing without permits are not the subject of this report.

² While the City does not maintain any database on these units, estimates include a range of between 42,000 to 100,000 of such units.

³ Parking regulations, allowable densities, open space, passageway and many other regulations have been created or changed over the decades.

Relief from planning and zoning codes can be very complicated. Fees, combined with the uncertainty of the zoning relief process, discourage many owners from even attempting the legalization process. Spending twenty thousand dollars on a process that offers no promises of successful resolution is a high risk proposition. Most owners decide not to take the risk and instead simply remove the unit once it has been discovered. This results in a dislocated tenant and loss of an often relatively affordable housing unit. Sometimes it relieves an un-habitable situation, but more often than not the unit was perfectly safe.

Initiatives by Other Cities

Many other cities have attempted to create specific programs to encourage the legalization of non-permitted units. Legalization programs run the gamut from simply making it possible for property owners to regularize their extralegal living spaces to offering significant zoning incentives to come forward. In California, most efforts have applied primarily to secondary dwelling units, although some permit legalizations in multiple family buildings. Experience appears to show that programs are most successful when pro-active encouragement, assistance and zoning relief are part of the program. Legalization programs should not expect to obtain universal participation, but, if well designed, they can result in the regularization of a significant proportion of a jurisdiction's non-permitted housing stock.

San Francisco

In an Executive Directive published on December 18, 2013, San Francisco's Mayor Ed Lee called for establishing a discretionary review process to ensure that property owners are able to make every effort to maintain a housing unit before pursuing its removal. In response, the City passed two ordinances in 2014. The first applies citywide and the second only in the Castro District.

The citywide ordinance allows one non-permitted unit per lot to be approved regardless of density limits in the zone. In addition, a ministerial approval process was created for projects where all zoning codes are met, except open space and light/air requirements (as long as they were met for other units). A separate rear yard unit also was no longer required to obtain a variance from rear yard requirements. Other requirements ensured that health and safety codes were met, that future illegal actions were not encouraged and that tenants had not been illegally displaced. Beyond zoning actions, San Francisco also created a process whereby an anonymous pre-assessment by City building and planning experts takes place before any decisions are reached. A Dwelling Unit Legalization Checklist must be signed and preliminary plans approved by the building department as part of the process. If a non-permitted unit is caught and an owner elects to pursue legalization the notice of violation is suspended while the process plays out. Any units created through the process are subject to Rent Stabilization, including relocation assistance. The separate unit cannot be subdivided and sold separately.

In one neighborhood, the Castro District, San Francisco went further by authorizing the Zoning Administrator to simply waive the most common barriers to legalization, including density limits, parking, rear yard and open space. The construction or legalization of one secondary unit of up to 750 square feet is permitted in buildings of up to 10 units and two units are allowed in buildings with more than 10 units. The limitation is that the unit must be constructed entirely within the building envelope. Legalized units in buildings constructed before 1979 are subject to rent stabilization.

Santa Monica

In 2003, the City of Santa Monica passed a law that allowed property owners to keep previously non-permitted units in exchange for bringing the dwellings up to a basic level of standards. However, full compliance with all current development standards is not required. Density and setback provisions are simply waived, and parking requirements can be adjusted if a traffic engineer determines that the provision of parking is not feasible.

The effort did not result in a large number of landlords coming forward to legalize their units (only 30 out of the estimated 484 bootleg units have been legalized). This may be because Santa Monica does not have a systematic code enforcement procedure that routinely cites illegal units for enforcement action. Also, because no time limits were established, there was less incentive to come forward in a timely fashion. Finally, it is worth noting that Santa Monica has a law that prevents rent stabilized units from being removed unless a finding is made that the unit is not habitable and cannot be reasonably made habitable. Therefore, the threat of enforcing an order to remove the unit may not be as high as it is in Los Angeles.

Salt Lake City

In 2012, Salt Lake City adopted an ordinance that establishes a special exemption process to legalize dwelling units that are not recognized. To legalize the unit(s) it must have existed for at least 17 years and provide current off-street parking requirements (or is located within one quarter mile of bus or transit stop). The law also requires that there not be a history of recurring zoning violations on the property under the current owner. The unit legalization ordinance created an expiration date of about a year after which applications were no longer accepted.

West Hollywood, CA

The City of West Hollywood initiated a *Legalization of Illegal Units* program in 2001. The program offers the waiver of certain zoning standards to property owners legalizing existing, non-permitted housing units. The program applies when the Building Official deems it physically feasible to make the unit come into compliance with the Building Code. Zoning incentives for the property owner include the addition of one extra unit in R1 and R2 zone categories and up to 20% increase in allowable density in higher density multifamily zones (outside of the Density Bonus program, which permits up to a 35% increase in density). Waivers from regular parking requirement are offered in most cases, except when the unit(s) occupies required parking areas.

Discussion of Key Issues

Finding the right balance between preserving quality, safe housing units and ensuring that zoning is fair and serves to protect residents and neighborhoods is the key to a successful dwelling unit legalization policy. Any legalization process should provide a legitimate option for people who wish to legalize previously existing units while protecting the majority of residents who abide by planning and zoning regulations and expect their neighbors to do so as well.

The main premise behind this unit legalization initiative is that there is a citywide benefit to ensuring the health and safety of all dwelling units. Additional benefits accrue by preserving

habitable housing units, particularly those that serve other City priorities such as affordability and transit-access. Both the City's General Plan and the Zoning Code already recognize the need for zoning deviations that benefit the public good and further these citywide policy objectives.

Any proposed relief from provisions of the Zoning Code would only apply to conversions that have been documented to have already occurred. Therefore it will not create any incentive for future illegal conversions or deviations from the Zoning Code. Finally, all other use, height and area regulations of the Municipal Code and all other applicable government/regulatory agencies will continue to be complied with in the development and use of the property, except as such regulations are specifically varied or modified to achieve a public purpose.

This section will highlight and discuss the key issues that may arise with any changes. Key planning/zoning questions for City Council to consider are whether:

- 1) A legalization program should require a commitment to providing affordable housing;
- 2) Parking requirements should be able to be relaxed near transit stations; and
- 3) The process should be by-right (ministerial) or require a review process (discretionary).

Protection of Neighborhood Character

The legalization of additional housing units beyond current zoning limits may raise concern about impacts on neighborhood character and quality of life. While every situation is different, the DCP believes that in most cases there would be minimal impacts. Most often, there is just one extra unit and it has been built within the approved building envelope so neighbors may not be aware the unit exists. In cases where violations do exist, such as parking in front yards or illegal additions, the aim would be to devise a system that would impose regulatory conditions that would need to be complied with prior to any approval.

Source of Affordable Housing

Residents living in non-permitted housing typically benefit from a more affordable housing option. Their removal decreases the City's overall housing stock at a time when more units are desperately needed. Legalization of these units would benefit the City's affordable housing goals; however, one concern is that legalization could actually result in rent increases for tenants and/or displacement unless adequate protections are put in place. There appears to be agreement between the City, apartment owner groups and tenant's organizations that residents of non-permitted units should have the same rights as other units in the building, including registration under the Rent Stabilization Ordinance. Owners should also be prevented from evicting tenants in the period prior to legalization. Part 1 of the Policy Recommendations section below addresses these issues in detail.

Beyond basic tenant protections, the DCP believes that granting zoning relief beyond current procedures should go further and require dedication of an affordable housing unit for a period of time (see Part 2 of the Policy Recommendations below). The provision of affordable housing provides a significant part of the rationale for the City to act proactively and assist property owners, some of whom may have not complied with laws in the past or stand to benefit from a past illegal conversion. This model is based on current zoning law and practice and the DCP believes it is an appropriate trade-off for the considerable benefit

being envisioned by a legalization program. It is worth noting that in most current legalization cases, the property owner volunteers an affordable housing unit as a condition of approval already.

Health and Safety

A key reason to proceed with legalizing unpermitted dwelling units is to verify and enhance the health and safety of unpermitted living space. The policy envisioned would require inspections and not allow for any variances from current health and safety building codes. A discretionary zoning modification procedure (either through Density Bonus or Zoning Administrator Adjustment) will require that any specific adverse impacts upon public health and safety or the physical environment be ameliorated. Specific project conditions or pre-approval requirements will be imposed to ensure presently unsafe conditions are rectified. If the action includes a sunset clause it will be more likely to get landlords to act quickly, ensuring life and safety provisions are addressed sooner than later.

Property Tax Revenue

Without official documentation of their legal existence, property tax assessments do not account for the value of the non-permitted dwelling units. Therefore no property taxes are effectively being paid to the City's General Fund on the units. Granting legal status to these units would allow the City to receive property taxes on these units; the revenue generated would help offset the costs that these units and their residents already impose on the City's resources such as infrastructure, education, police, etc.

Policy Recommendations

In line with the City Council direction, the concepts presented here provide ways that the City could offer greater assistance to property owners wishing to legalize a small number of non-permitted units. A new policy could include: 1) increased technical assistance and enforcement procedures, as well as 2) a new pathway for certain limited zoning modifications, perhaps tied to particular attributes like affordability or transit-orientation. The new strategy would also need to ensure protections for the rights of 3) tenants; 4) neighbors/neighborhood character; as well as 5) the health and safety of tenants. These items are discussed in detail below.

1. Assistance for Property Owners

Currently, a property owner that is cited by a code enforcement inspector is given an order to remove the unit or get it permitted within 30 days. The order normally requires tangible progress in obtaining building permits to obtain a time extension. This may not be enough time for the average property owner to determine all of the facts (which may include complicated building and zoning code questions), get the necessary application materials, hire a contractor or land use consultant and obtain necessary funding. Property owners wishing to legalize their units pro-actively (not under an order to comply) may be wary of asking questions about legalization for fear that they would attract enforcement attention. Policy options to provide greater assistance to property owners may include:

- *Anonymous Inquiries* - Allow easy, anonymous access to information about whether the unit(s) is already legally recognized and, if not, what the legalization process would entail. This may include creating a web site, email account and phone number

to respond to inquiries without fear of self-implication or threat of enforcement action (The SCEP program will eventually discover non-permitted units).

- *Pause in Enforcement Action* - Provide a temporary suspension from code enforcement action (fines and orders), outside of imminent life and safety hazards, as long as legalization is actively being sought. Basic health and safety features such as smoke detectors should be installed at this time, if they are missing.
- *Initial Screening Process* - Create a process to allow an HCIDLA inspector to assess non-permitted units to determine the extent of building code compliance and help owners understand the estimated costs to legalize before filing an official application.
- *Inter-Department Case Management* - Provide those wishing to legalize non-permitted units entry to the Development Services Case Management (DSCM) and/or the Parallel Design Permitting Process (PDPP). Both allow for more coordinated and personalized intra-departmental assistance (DCP, DBS, HCIDLA, etc), which these complicated cases often need.
- *Public Outreach Campaign* - As part of any legalization process, a public outreach campaign should be included to “get the word out” about the program’s benefits, as well as the limited period of time to take advantage of it.

2. New Paths towards Zoning Compliance

As discussed, non-conformance with current zoning regulations is believed to be a primary barrier to legalization of units in multifamily buildings. The number of allowable units on the site (i.e. density) is the most common zoning violation faced by owners, followed by insufficient number of parking spaces and then things like open space, passageways and yard requirements. A modification from these regulations typically requires a Zone Variance procedure, which presents a high bar for legalization (discussed in Appendix A). If the intention of the City Council is to remove obstacles towards legalization of otherwise safe and habitable dwelling units, an alternative to the Zone Variance process is likely required. The DCP proposes three policy options that City Council could choose to address zoning compliance.

The DCP’s recommended approach (Option 1 or 2) relies on concepts well established in state and city law. Linking (limited) zoning relief to affordability requirements already occurs through the State required Density Bonus program, as well as in certain local plans. While the formal connection to affordable housing does not exist formally in today’s variance or adjustment procedures, the majority of recent applications to legalize units offer to designate the legalized units as income restricted affordable housing already. The DCP recommended policy would seek to clarify, expedite and expand the applicability of this approach, while including a process that protects neighborhood compatibility.

The approach could be made discretionary (Option 1 below) or ministerial (Option 2). The discretionary option (1) would allow for a more individual and thorough assessment of any potential neighborhood issues that need to be addressed at the time of legalization. The ministerial option (2) would result in a faster and more affordable process, which would act as a greater incentive for applicants to pursue legalization. A third option is presented (3), which would not require any commitment to provide affordable housing. It would simply transfer most minor Variance requests for legalization of units to Zoning Adjustment procedures.

The policy proposals described below are consistent with the types of Zone Variances and Zoning Adjustments being approved by the Zoning Administrator currently. A review of such cases in the last two years has shown the majority of requests to legalize units in multifamily buildings were approved (often with affordable housing included).

Zoning Compliance Option 1:

- *Discretionary Process with Affordability and Transit Proximity.*
As stated above, the dedication of units as affordable housing offers the primary rationale to provide zoning relief to property owners seeking legalization. Utilizing the current Density Bonus program, which is normally a discretionary action⁴, offers various benefits but also some potential down-sides. On the positive side, the process requires a finding that the granting of zoning incentives does not have an adverse impact on the physical environment, public health and safety or historic resources. This allows the City to add conditions to mitigate potential negative impacts. Adjacent property owners are also notified of the decisions and have the ability to appeal. This allows potential impacts of the extra unit(s) to be identified, but also introduces a more time-consuming, expensive and less certain process for property owners (although denying Density Bonus requests outright is very difficult).

The DCP believes a few minor adjustments could be made to the current Density Bonus program so it could be made more effective and useful for these types of projects. First, the City can clarify that legalization of units qualifies as a Density Bonus project under the existing “rehabilitation” criteria set forth in State Law. Second, since about half of all multifamily units cited for being non-permitted are located in 2-4 unit buildings, which are not currently able to participate in the Density Bonus program, the Council could consider whether to expand the program to include these properties (or just 3 and 4 unit buildings) for retroactive legalizations. Only one extra unit would be allowed in these smaller multifamily buildings. Third, the Council could consider whether to allow greater flexibility with the allowable affordable income and rent levels, considering that it may be difficult to income-restrict a unit at the very low and low-income levels. This is because, in some cases, a low-income tenant may not be living in the building and therefore someone would need to leave voluntarily before a tenant with the right income could be selected. A moderate income allowance (up to 120% area median income) would make it more likely that a property owner could immediately dedicate an existing unit as affordable rather than wait for a unit to be vacated.

With regards to parking requirements, the Density Bonus program allows projects to utilize one of two alternative parking options (LAMC 12.22.A.25(d)). However, neither is likely to be particularly useful for most of the kinds of projects coming forward under legalization. As mentioned, many older buildings may be operating under non-conforming parking rights from when the building was constructed and have no viable location for additional spaces under today’s requirements. To

⁴ A project only requiring the (up to 35%) density bonus and current parking incentives is by-right and does not require Planning Department review. However, most projects request additional zoning incentives or waivers from development standards, which makes the process discretionary (a Director’s Determination).

address this, a third parking option could be introduced that recognizes the unique situations of these buildings and the City's policy objective of combining affordable housing near transit on lowering car usage. For example, if a property takes advantage of the Density Bonus program and is located near a major transit stop, the City could allow current non-conforming parking regulations on existing units to remain, in addition to the current one space per affordable unit requirement. Or the City council simple offer a waiver of parking for the legalized unit if not feasible means exist to create a new space, as determined by a traffic engineer. City Council can decide how close to transit a property must be to qualify for this provision (DCP recommends 1,500 feet).

Zoning Compliance Option 2:

- *Ministerial (By-Right) Process with Affordability and Transit Proximity*
This option is similar to Option 1 above, in terms of requiring the provision of a long-term affordable housing covenant and transit proximity to obtain certain zoning/parking modifications. However, rather than a discretionary process, this option would make the legalization by-right, if qualified through a set of public benefit performance standards. A checklist could be incorporated at the time of approval, to ensure that the most obvious neighborhood compatibility concerns are addressed (such as parking on the front lawn or illegal additions) through the process. This process would have the benefit of being more attractive to property owners, in that planning fees would be minimized and the length of time for planning approval would be cut from several months to a day. Staffing needs would also be much lower. The City would receive the same affordable housing and transit-oriented housing benefits. This option, however, would not provide the opportunity for detailed investigation of site conditions, or neighborhood notification or appeal.

Zoning Compliance Option 3:

- *Expand Zoning Adjustments* - This option would not require affordable housing or transit proximity. As conceived, it would simply allow the Zoning Administrator's Adjustment procedure to be utilized for certain minor zoning modifications that today require a Zone Variance. Most importantly, this would include an adjustment (up to 20%) to the number of allowable dwelling units, as well as a defined parking adjustment. This option would include neighbor notification, an optional public hearing and a thorough framework for ensuring neighborhood compatibility and protection of health and safety. The disadvantage is that it would not result in the creation of any affordable housing or require transit proximity to receive the zoning/parking relief.

3. Protections for Tenants

DCP recommends that any legalization should seek to protect tenants living in currently non-permitted units. Tenants likely do not even know they are living in a non-permitted unit and should not have to worry about dislocation and/or significant rent increases as the result of the legalization process. Tenant protections serve the current tenant but also citywide policies on displacement and affordable housing. Therefore, in consultation with HCIDLA, this report recommends the following tenant protections:

- *Rent Stabilization Ordinance* - If the building where the unit is being legalized meets Rent Stabilization Ordinance requirements, the requirements would be extended to include the legalized unit.
- *Recent Evictions* - The program should make clear that property owners will be unable to evict tenants prior to legalization of the unit(s). San Francisco imposes a waiting period of time of 10 years before units where a (no fault) eviction took place may seek legalization (5 years if the eviction was due to the owner moving into a unit). Verification of this provision should be part of the initial screening process.
- *Rehabilitation Costs* - There may be significant costs associated with rehabilitating and making a non-permitted unit habitable. Under current rules, it is possible these costs could be passed-through to tenants. San Francisco amended their rent stabilization ordinance to prohibit the costs of legalization from being passed through to the tenant and prohibits condo-conversion of such legalized units. Los Angeles could consider similar amendments.
- *Tenant Habitability Plan* - The City's current Tenant Habitability Program requires landlords of rent stabilized units to mitigate conditions related to Primary Renovation Work that might make occupied rental units temporarily uninhabitable. The legalization process should ensure that a Tenant Habitability Plan is required, even if a unit is not considered legal as yet.

4. Protections for Neighbors

Any policy changes will need to balance the desire to retain badly needed housing units with the protection of neighbors and neighborhoods. Bringing neighbors into the process lengthens the process, but also ensures that any impacts the legalized unit(s) is causing can be known and therefore addressed.

- *Notification and Appeals* - A policy should be created to notify immediate neighbors of any zoning relief created through this process. Opportunities to appeal should also be included.
- *Conditions of Approval* - Allow for the inclusion of conditions of approval to mitigate any neighborhood impacts associated with the extra units.
- *Time Limits* - The provisions should be time restricted. That is, only units that were established before a certain date could be eligible for legalization. Documentation would need to be provided to establish unit eligibility (such as utility bills or registration with HCIDLA). This will ensure that an incentive to create additional non-permitted units does not result from the program. The City Council would have the ability to revisit the sunset dates set for the program, if necessary.
- *Compliance with Laws* - A newly legalized unit should ensure compliance with the array of laws that apply to all apartment owners in the City of Los Angeles. This includes requiring business licenses from the Department of Finance to rent property, registration under the Rent Stabilization Ordinance and Systematic Code Enforcement Program (SCEP) inspections.

5. Health and Safety Protections

- *Code Requirements* - As is the case today, no health and safety building codes will be compromised as part of any legalization process.

- *Sunset Date* - A sunset date on any incentives provided for the legalization process should be included to compel owners to act quickly, in the name of health and safety.
- *Hazard Reduction Checklist* - The “hazard reduction checklist” mentioned in #1 above will identify the major code compliance issues that will need to be addressed prior to the issuance of any permit.

Recommended Actions

1. Instruct the City Attorney’s Office, with the assistance of the Department of City Planning and Housing and Community Investment Department, prepare a comprehensive, citywide ordinance that regulates the legalization of non-permitted housing units in multifamily buildings in line with Policy Recommendations 1 (Assistance for Property Owners), 3 (Protections for Tenants), 4 (Protections for Neighbors) and 5 (Health and Safety Protections) in this report.
2. Direct the DCP as to which of the three proposed paths towards zoning compliance options under Policy Recommendation 2 (New Paths Towards Zoning Compliance) is preferable and direct the City Attorney’s Office and Department of City Planning staff to develop a draft Zoning Ordinance to amend relevant sections that option.
3. Instruct Staff to continue to work with the concerned parties taking part in the Rent Stabilization Ordinance working group to develop the details of the Ordinance and any accompanying administrative materials.
4. Instruct Staff to prepare an analysis of any staffing needs that may be required to develop the Ordinance and ensure successful implementation.