

# Staff Report to the Housing Commission

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To: The Chairman and Members of the Housing Commission  
From: Nora Boyer, Housing Planner  
Re: Arlington 425 – Response to Affordable Housing Guidelines  
Report Prepared: April 25, 2019  
Meeting Date: April 29, 2019

## Background

Arlington 425 is a residential and commercial development proposed for the northern three quarters of vacant Block 425 located in downtown Arlington Heights. Block 425 is bounded by Campbell Street to the north, Sigwalt Street to the south, Highland Avenue to the east, and Chestnut Avenue to the west.

The proposed development would involve the construction of three buildings on the site; one building along Chestnut Avenue, one building along Campbell Street, and one building along Highland Avenue. The developer is proposing a four-story residential building on the Chestnut Avenue side of the site, a nine-story residential building with ground floor commercial space on the Campbell Street portion of the site, and a thirteen-story building with five floors of parking and residential units above on the Highland Avenue side of the site. The total number of residential units proposed in the three buildings is 361.

## Affordable Housing Guidelines

The Village of Arlington Heights' affordable housing guidelines suggests that, in a rental development of this size (i.e. a development of 26 or more units), 15% of the units be affordable to households at or below 60% of Area Median Income (AMI) at affordable rents. Therefore, the guidelines call for 54 affordable units in this development (361 total units x .15 = 54 affordable units).

## Developer's Proposals

December 20, 2018 Letter - In their first formal response to the Village's affordable housing guidelines, the developer stated that they were "committed to promoting affordability in private housing within the Village." They further stated that due to the cost of development they would be unable to finance and ultimately sell the development with 54 affordable units. Instead, the developer committed to providing 15 affordable units in the development.

February 8, 2019 Letter - The developer provided additional details stating that the proposed 15 affordable units would be studio and one-bedroom units located in all three buildings. The developer further stated that they reserved the right to allocate the units among the buildings; that unit sizes would equate to the average unit types and sizes in each of the buildings; and the number of affordable units would be reduced to 13 if the building facing Chestnut is developed as a condominium project.

April 4, 2019 Letter - The developer's current response to the affordable housing guidelines states that they would provide actual affordable units and/or to provide payments in lieu (or a combination) equivalent to 27

units (rather than 54) with the actual number of units, payments in lieu of units, allocation of units among buildings; and other considerations to be discussed with the Housing Commission.

April 12, 2019 Meeting – Staff met with the developer at which time the developer proposed 27 units as follows:

1. 20 actual affordable units or 5.5% of total units in the development.
2. Income eligibility and rent levels affordable at 80% of Area Median Income (AMI).
3. That the affordable units all be studio and one-bedroom units.
4. A fee in lieu payment for 7 affordable units or 2% of total units in the development at \$25,000 per unit (\$175,000 total).

April 12, 2019 Meeting Referenced Above – Staff presented the following to the developer:

#### Staff Alternative Proposal

At the April 12, 2019 meeting referenced above, staff proposed 27 units in the following alternative:

1. 18 actual affordable units or 5% of total units in the development
2. Income eligibility and rent levels affordable at 60% of Area Median Income (AMI).
3. That the affordable units all be studio and one-bedroom units.
4. A fee in lieu payment for 9 affordable units or 2.5% of total units in the development at \$25,000 per unit (\$225,000 total).
5. Preference is to be given to current Arlington Heights residents and/or veterans.
6. If the affordable housing guidelines are revised in the future resulting in a lower requirement than what the developer and Village agree upon, the lower of the two standards would be applied going forward.

#### Analysis

The following issues have been identified when analyzing this and other affordable housing proposals under the Village's guidelines:

Cost of providing an affordable unit:

In evaluating the cost of providing actual affordable units, staff evaluated the 4 N. Hickory project, Arlington Downs, and an existing apartment building that was for sale and listed on Loop Net in the summer of 2018. On average, the cost to build or acquire apartment units ranges from \$157,000 to \$252,000 per unit (average \$204,500/unit). At the estimated value of \$204,500/unit, the value to purchase or build 18 affordable housing units is approximately \$3.7 million.

Financial impact on development/Loss of developer income:

Based on the \$2.32 monthly market rate rent per square foot of apartment spaces reported by the developer:

- Total estimated rent for the development annually: \$8,458,200
- Lost rent income for 20 units per the developer if 1/3 of the affordable units are studio units (7 units) and 2/3 are one-bedroom units (13 units) as shown below is \$188,148 or 2.2% of gross rental income per year.

Projected Market Rent vs. Rents Affordable at 60% AMI (2018)

	2019 Arlington Heights Max. Monthly Rent	Market Rate Rent at \$2.32 per sf	Difference in Rent per Month	# of Affordable units	Total Lost Rent per Month	Total Lost Rent per Year
Studio Unit	\$889	\$1,385	\$496	7	\$3,472	\$41,664
One-bedroom Unit	\$952	\$1,891	\$939	13	\$12,207	\$146,484
				20	\$15,679	\$188,148

\*There may be programs available that could reduce the rent differentials.

#### Village Guidelines and Village Board Directives:

##### 1. Negotiation and Emphasis on Inclusion of Affordable Units

As the Housing Commission is aware, the 15% affordable housing goal for larger developments as stated in the Village's guidelines has only been attained on a few occasions and usually by niche affordable housing developers that utilized multi-layered financing including government-sponsored affordable housing financing programs. The fee in lieu of affordable units of \$75,000/unit has never been attained, with the most common recently approved amount being \$25,000 per affordable unit. See the attached Inclusionary Affordable Housing Table for the history of units and fees approved to date.

The percentage threshold and fee amount are guidelines (both of which have been reduced from the original amounts). The Housing Commission and the Village Board have evaluated projects on a case-by-case basis to determine the number of affordable units that are feasible in each development given factors such as housing market conditions, land cost, construction cost and infrastructure needs. The Village has not yet adopted its guidelines by Code as it was recognized that every new development is subject to unique circumstances.

During this project's early review before the Village Board, and last summer when discussing other development projects, the Village Board made it clear that they wish to see actual units included within future rental developments. This preference is consistent with the guidelines as stated in the *Multi-Family Affordable Housing Toolkit for Rental Housing* that it distributed to developers:

*"The construction of the affordable units is preferred. However, in lieu of providing affordable units as per the Village's guidelines above the suggested payment in lieu of providing the affordable units is \$75,000 per unit with the funds to be used by the Village exclusively to create and/or preserve affordable housing in the Village." (emphasis added)*

Privately-financed developments have been unable to incorporate the number of affordable units or pay the fee in lieu amount as stated in the Village's guidelines; otherwise these privately-financed projects would not have been feasible and, as a result, no affordable units would have been created nor would contributions have been made to the Affordable Housing Trust Fund. Since the inception, the Village has modified its guidelines and the Housing Commission continues to evaluate and consider recommending adjustments to the guidelines with the goal to create affordable housing without inhibiting development. Over the past couple of years, the bar has been raised for the number of actual units and the fee in lieu amounts that are provided or required.

## 2. Income Eligibility Standard

The Village's guidelines directs affordable rental programs to households at or below 60% of AMI. The developer proposes an income eligibility standard to 80% AMI.

The two income eligibility levels, adjusted for household size, are:

Household Size	2018 Max. Income at 60% AMI	2018 Max. Income at 80% AMI
1	\$35,580	\$47,400
2	\$40,620	\$54,200
3	\$45,720	\$60,950
4	\$50,760	\$67,700

The Village's income eligibility standard is set at 60% AMI for the following reasons:

- The Illinois Affordable Housing Planning and Appeal Act which requires that 10% of Illinois communities' housing stock be affordable sets the income eligibility standard for affordable rental housing at 60% AMI. Therefore, units created that meet this standard contribute to the Village meeting the State-required units whereas units created to be affordable at 80% AMI would not.
- The 2013 *Homes for a Changing Region* report for Arlington Heights indicated that there is:
  - Insufficient rental housing units in Arlington Heights, at the current and projected demand, for renter households with annual incomes at or below \$35,000/year (in 2013 dollars), which is more consistent with the 60% AMI levels.
  - An excess of rental housing units in Arlington Heights, for current and projected demand, for renter households with annual incomes above \$35,000 - \$75,000 (in 2013 dollars), which is more consistent with the 80% AMI levels.
- As indicated below, the difference between the affordable monthly rent between the developer's market rate and monthly rent affordable at 80% AMI is a discounted rent but the difference between the market rate rent and rent affordable at 60% AMI provides a meaningful measure of affordability.

Projected Market Rent vs. 60% and 80% AMI (2018)

	Market Rate Rent/Month	Affordable Rent at 80% AMI/Month	Difference between Market Rent and Rent at 80% AMI/Month	Affordable Rent at 60% AMI/Month	Difference between Market Rent and Rent at 60% AMI/Month
Studio Unit	\$1,385	\$1,185	\$200	\$889	\$496
One-Bedroom Unit	\$1,891	\$1,270	\$621	\$952	\$939

\*Affordable rents for a studio unit is calculated at 30% of maximum monthly income for a one-person household at 80% AMI and 60% AMI. Affordable rent for a one-bedroom unit is calculated at 30% of monthly maximum income for a 1.5 person household at 80% and 60% AMI. This is the method used by the Illinois Housing Development Authority.

For these reasons, staff believes that it is better have fewer units affordable at 60% of Area Median Income (AMI) rather than more affordable units at 80% of Area Median Income (AMI).

3. Unit Size Mix

The Village's guidelines call for the size (i.e. bedroom mix) and the standard interior finishes of the affordable units to be consistent with the market rate development. The guidelines also state that the affordable units are to be disbursed throughout the development.

The developer is proposing studio and one-bedroom units at a proportional mix but no two-bedroom units due to the larger rent differential

Of the studio and one-bedroom units proposed for Arlington 425, approximately 1/3 are studio units and 2/3 are one-bedroom units. Therefore, the bedroom mix of the affordable units should reflect these proportions and be disbursed throughout the Arlington 425 rental buildings.

Recommendation

After analyzing the cost of providing affordable units, financial impacts on the Arlington 425 developer, and the Village Boards goals and directives, it is recommended that the affordable housing component of Arlington 425 meet the following conditions:

1. 18 actual affordable units be provided (5% of all units), affordable at 60% Area Median Income (AMI) that are to be affordable in perpetuity.
2. A payment in lieu of 9 units (2.5% of all units) to be paid at \$25,000 per unit (\$225,000 total) at the time of permit issuance for the first building to be constructed at Arlington 425.
3. The income eligibility standard for the affordable units is to be 60% of the Area Median Income (AMI) for the Chicago-Joliet-Naperville area, adjusted for household size as updated annually by HUD.
4. The maximum rents are to be the rents determined to be affordable to households at 60% of Area Median Income (AMI) for the applicable unit sizes (studio and one-bedroom units) according to the method used by the Illinois Housing Development Authority (IHDA) for the Chicago Metro Area.

5. That 1/3 of the 18 affordable units will be studio units (6 studio units) and 2/3 of the affordable units will be one-bedroom units (12 one-bedroom units), which is consistent with the proportions of these units in the development.

6. Preference for tenancy of the affordable units will be given to current Arlington Heights residents and/or veterans.

7. The developer shall submit an annual report concerning compliance with the affordable housing program by January 31 of each year in a form as determined by the Village and in compliance with all other elements of the guidelines.

8. If the Village's affordable housing guidelines are revised prior to the issuance of the first building permit for this project to standards that are lower than what the developer and Village agree upon, that the lower of the two standards will be applied.

Additionally, it is recommended that the Housing Commission evaluate the guidelines and recommend modifications to address market conditions and eliminate future case-by-case negotiations.









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December 20, 2018

**RECEIVED**  
DEC 21 2018  
PLANNING & COMMUNITY  
DEVELOPMENT DEPARTMENT

Ms. Nora Boyer  
Housing Planner  
Housing Commission  
Village of Arlington Heights  
33 S. Arlington Heights Rd.  
Arlington Heights, IL 60005-1403

**Re: Request for Affordable Housing Review by Housing Commission - Arlington 425 /  
CCH LLC - Temporary File Number T1599**

Dear Nora:

Please consider this letter our formal request to present the affordable housing aspects of our proposed project, "Arlington 425", before the Housing Commission of the Village of Arlington Heights.

As you are aware, CCH LLC, the owner and developer of Arlington 425 (the "Owner"), is proposing a new mixed-use development on the parcel of vacant land identified as Block 425 in the Village of Arlington Heights Downtown Master Plan. I have been authorized to deliver this letter to the Village for and on behalf of the owner of the project (the "Project").

The Project will involve a new PUD consolidating seventeen lots into a single lot as well as the construction of three buildings containing a total of 361 residential dwelling units, currently planned as all "for-rent" apartments. One building will be located along Campbell Street and will contain nine stories, with commercial / office space on the first two floors and 182 apartment units on the top seven floors (42 studios, 91 one-bedroom and 49 two-bedroom). One building will be located along Highland Avenue, and will contain thirteen stories with the first floor reserved for commercial use, the next six floors will consist of a 454-space parking garage, and the final six floors containing 125 apartment units (101 of which will be one-bedroom and twenty-four of which will be two-bedroom). The third and final building is currently planned to be a four-story apartment building located along Chestnut Avenue containing fifty-four units (28 one-bedroom and 26 two-bedroom).





Ms. Norma Boyer  
December 20, 2018  
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The Project will be marketed at upper-middle class residents. Accordingly, a standard unit within the Project will likely not be affordable to the average lower-income individual. Nonetheless, our client intends to meet the Village's affordable housing requirements in a manner consistent with other current and previous developments within the Village.

Our client will provide handicap-accessible apartments in a reasonable quantity to meet potential tenants' needs. Although the exact number of handicap-accessible units has not yet been determined, we are currently conducting studies to ensure that the proper amount is provided, and we welcome input from the Village and Housing Commission as to this issue.

As to the number of affordable housing units within the Project, the Village currently requires that PUDs with twenty-six or more units contain 15% or more affordable housing units. This would require our client to provide 54 affordable housing units within the Project. While our client is committed to promoting the affordability of private housing within the Village, it is an unavoidable reality that the scale of this project and the size of the parcel to be developed will not allow our client to provide the full amount of fifty-four affordable housing units while still being able to finance the development and ultimately sell the Project. Based on the cost of development as well as the ultimate value of the project upon disposition, Owner simply cannot develop this Project and provide 54 affordable housing units.

Rather, our client is committed to providing 15 affordable housing units in the Project, and will otherwise comply with the remaining requirements of the Affordable Housing program.

We look forward to presenting this project before the Housing Commission for review, comment, and approval.

Sincerely,

A handwritten signature in black ink that reads 'Michael D. Firsell'.

Michael D. Firsell

MDF/djm





## Village of Arlington Heights

33 South Arlington Heights Road  
Arlington Heights, Illinois 60005-1499  
(847) 368-5000  
Website: [www.vah.com](http://www.vah.com)

January 4, 2019

Mr. Michael D. Firsel  
Firsel Ross – Attorneys at Law  
2801 Lakeside Drive, Suite 207  
Bannockburn, IL 60015

Re: Affordable Housing Proposal – Arlington 425 Project – Temp File No. T1599

Dear Mr. Firsel:

In your response, you state that "the size of the parcel to be developed will not allow our client to provide the full amount of fifty-four affordable housing Units while still being able to finance the development and ultimately sell the Project."

In order that the Village may evaluate your affordable housing proposal, the Village requests the following documents and answers to questions:

1. Provide a detailed financial pro forma to validate your statements that 54 affordable units are not financially feasible, and that no more than 15 affordable units are financially feasible.
2. Provide a breakdown of the 15 units you propose to provide by building. What are the square footage areas of each proposed affordable unit? Of the proposed 15 units, how many will be studio, 1-bedroom and 2-bedroom units?
3. Does the developer expect to use any federal or other affordable housing programs to subsidize the rents in the affordable units?

The Village looks forward to receiving your response. Please contact me at (847) 368-5214 or [nboyer@vah.com](mailto:nboyer@vah.com) if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Nora A. Boyer", is written over a horizontal line.

Nora A. Boyer  
Housing Planner





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February 8, 2019

Ms. Nora Boyer  
Housing Planner  
Department of Planning and Community Development  
Village of Arlington Heights  
33 S. Arlington Heights Road  
Arlington Heights, Illinois 60005

**Re: Request for Housing Commission Review - Arlington 425 Development**

Dear Ms. Boyer,

This letter is written in response to yours of January 4, 2019. The paragraph references below correspond to those contained in your letter.

1. We are unable to provide a "detailed financial proforma" at this time. The main reason is that we have not yet developed a detailed financial proforma because we do not have the approvals and other project requirements necessary to know what we are building and how we are building the project. Without accurate pricing which is integral to any detailed project financial proforma, the requested proforma cannot be completed. However, we have prepared, and I have attached a financial impact analysis of providing 1, 15 and 54 Affordable Housing units. This analysis indicates what the financial impact on both the project's cash flow and sale value will be. Based on the developer's 40+ years of experience in the industry, this project is not viable based on (a) the loss of annual income necessary to secure a financeable debt service coverage ratio; and (b) the ultimate market value of the development which value is primarily a function of a capitalization of the project's income stream. The project is hardly viable with even the 15 Affordable Units, but the Developer is committed to providing the number of Affordable units proposed. We request that you to review this analysis.

2. The proposed 15 Affordable Housing units would consist of studio and one-bedroom apartments located in all three buildings. The Developer would reserve the right to allocate the units among the buildings. The unit sizes will equate to the average unit types and sizes in each of the buildings. Were the Chestnut building to be developed as a condominium





Ms. Nora Boyer  
February 8, 2019  
Page 2

project. the number of Affordable units would be reduced to 13 units between the Highland and Campbell buildings.

3. We have not yet investigated the availability of additional sources of income to supplement the loss of income from the Affordable Housing units. However, if available, we will likely pursue such availability.

In addition, we have studied the historical Affordable Housing requests and requirements for the developments in the Village to date. Based on our review of that information, we believe that the proposed number of Affordable Housing units is consistent with past and current Village practices.

Based on this response to your request for further information, we request a meeting with staff as soon as possible to review and further discuss our proposal, so we can move to a Housing Commission hearing as quickly as possible.

Thank you for your cooperation and consideration in this matter.

Sincerely,

A handwritten signature in blue ink that reads 'Michael D. Firsell'. The signature is written in a cursive, flowing style.

Michael D. Firsell

MDF/djm



CCH LLC - AFFORDABLE HOUSING												
CASH FLOW AND VALUE COST												
I Unit	avg sf	rent sf	avg rent/mo	max for 2018	lost rent	# units	mo loss	loss/unit/yr	Annual Cash Flow Loss	Value loss		
										5 years	10 years	20 years
1-br	815	\$ 2.32	\$ 1,891	\$ 952	\$ 939	1	\$ 939	\$ 11,266				
									\$ 11,266			
										\$ 56,328.00		
											\$ 112,656	
												\$ 225,312
15 Units Proposed												
Studio	597	\$ 2.32	\$ 1,385	\$ 889	\$ 496	8	\$ 3,968	\$ 47,620				
1-br	815	\$ 2.32	\$ 1,891	\$ 952	\$ 939	7	\$ 6,572	\$ 78,859				
									\$ 126,479			
										\$ 632,395	\$ 1,264,790	\$ 2,529,581
54 Units - Per Code												
Studio	597	\$ 2.32	\$ 1,385	\$ 889	\$ 496	27	\$ 13,393	\$ 160,717				
1-br	815	\$ 2.32	\$ 1,891	\$ 952	\$ 939	27	\$ 25,348	\$ 304,171				
									\$ 464,888			
										\$ 2,324,441	\$ 4,648,882	\$ 9,297,763





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April 4, 2019

Mr. Alex Hageli, Chairman, and  
members of the Village of Arlington Heights  
Housing Commission  
33 S. Arlington Heights Road  
Arlington Heights, Illinois 60005

**Re: REVISED - Affordable Housing Proposal - Arlington 425 Development -  
PC #19-001**

Dear Mr. Hageli,

This letter is written as a revised proposal by the Petitioner for the provision of affordable housing units at Arlington 425. Based on Petitioner's 40+ years of experience in the development industry, this project is not viable with the inclusion of 54 affordable housing units based on (a) the loss of annual income necessary to secure a financing; and (b) the ultimate market value of the development which is primarily a function of a capitalization of the project's net income. **Petitioner will agree to provide a total of 27 affordable housing units.**

The allocation of the actual number of units to be leased or payment in lieu, the allocation amongst the buildings, and other related issues can be discussed and resolved with the Housing Commission in person.

We have studied the historical affordable housing requests and requirements for the developments in the Village to date. Based on our review of that information, we believe that the proposed number of affordable housing units meets and exceeds previous Village practices and policies.

We request a hearing with the entire Housing Commission as soon as possible to review and further discuss our proposal, and arrive at a mutually acceptable recommendation to the Village Board.

Thank you for your cooperation and consideration in this matter.

Sincerely,

Michael D. Firsell



## **INCLUSIONARY AFFORDABLE HOUSING TABLE**

Last updated: 4/24/2019

<b>Year</b>	<b>Development</b>	<b>Total Number of Units in the Development</b>	<b><u>Required</u> Number of Affordable Units as per the Village guidelines</b>	<b>Number of Affordable Units included in the <u>Approved</u> Projects</b>	<b>Cost Offsets</b>	<b>Fee-in-Lieu Contributions</b>
2004	Timber Court for-sale condominiums	108 units for sale condominiums approved  72 units have been constructed	21 units (20% of all 108 units)  $108 \times .20 = 21$ affordable units	Approved: 21 affordable units (20% as required by policy). Seven (7) in each of 3 buildings.  Two (2) buildings have been constructed with a total of 14 units affordable units (7 in each of the 2 buildings).	Density Bonus  \$100,000 in Village paid road improvements	\$0
2011	Arlington Downs rental apartments	Up to 475 rental units in Phase II	95 units (20% of all 475 units)  $475 \times .20 = 95$ affordable units	Approved: Up to 24 affordable units First 300 units: 0%.  If more than 300 units are developed up to an estimated maximum of 475 units are constructed, 5% of all units in Phase II would be affordable.  $475 \text{ max total units in Phase II} \times .05 = 24$ affordable units	None	The owners had the option of paying a fee in lieu of affordable units at the rate of \$100,000 for each affordable unit not provided. The developer was given the option to do a combination of affordable units and payment of the fee. (Amended for 263 unit ADR II building, see below).
2012	Arbor Lane for sale townhomes	16 townhomes	2 townhomes (12% of all 16 units)  $16 \times .12 = 2$ affordable townhomes	Approved: 0 townhomes (see fee-in-lieu)	None	Fee-in-lieu payment : \$30,378  5% of the average sale price when half of the units (8 units) are sold or the average sale price of the units sold one year from the date of the first occupancy permit (which was issued on November 19, 2014), whichever comes first.
2014	Parkview Apartments rental apartments	45 rental apartments	7 units (15% of all 45 units)  $45 \times .15 = 7$ affordable units	Approved: 7 units shall be maintained as affordable in perpetuity. Additional affordable units are included in the project in connection with affordable housing program financing of the project. It is reported that 41 of the 45 units are affordable.	None	\$0
2016	Lexington Homes – for sale townhomes	48 for-sale townhomes	7 affordable units (15% of all 48 units)  $48 \times .15 = 7$	0 affordable units (see fee-in-lieu)	None	In lieu of providing 7 affordable units, the developer will pay a fee equal to \$2,500 for each of the 48 units in the development or \$17,142 per affordable unit for a total of \$120,000.



2017	Heart's Place	18 rental apartments for persons with disabilities	2 affordable units (10% of all 18 units)  18 x .10 = 2 affordable units	Approved: The project was proposed as a 100% affordable building.  All 18 units are affordable.	None	The development is supportive housing for persons with disabilities. All 18 units (100%) are affordable.
2017	Sigwalt Apartments	86 rental apartments	13 units (15% of all 86 units)  86 x .15 = 13 affordable units	0 affordable units (see fee-in-lieu)	Density increase from approximately 60 units to 86 units.	\$325,000 or \$25,000 per affordable unit not provided. \$25,000 x 13 = \$325,000. This equates to approximately \$3,780 spread across all 86 units. The proposal was revised to 80 units which would have required 12 affordable units x \$25,000 = \$300,000. The project was not approved by the Village Board for reasons other than the affordable housing aspect of the project
2018	4 N. Hickory Hickory/Kensington Apartments	75 rental units	11 units (15% of all 75 units)  75 x .15 = 11 affordable units	None	Various variations requested. TIF assistance.	The Housing Commission accepted the petitioner's offer to pay a fee in lieu of affordable units of \$25,000 per affordable unit not provided in the development: 11 x \$25,000 = \$275,000. Approved by Village Board 7/16/18.
2018	Arlington Downs – Proposed amendment of affordable housing requirement (2018)	Phase II  263 rental units referred to by the developer as ADR II.  (180 senior units are informally referred to in the plans but not proposed at this time – i.e. ADR III).	Phase II total  40 units (15% of all 263 units)  263 x .15 = 40 affordable units  13 (5%) affordable units was approved in 2011 – see above	9 affordable units	Various variations.	Following strong direction from the Village Board that the inclusion of affordable units is favored by the Village Board rather than satisfaction of the requirement through payment of the fee, the approved requirements is: 9 affordable housing units in ADR II and fee in the amount of \$25,000 each for 4 affordable units not provided (i.e. \$100,000).