

## ATTACHMENT 2

Section in Policy	Topic	Issue	Proposed Amendment
2019 Report	Income eligibility	2019 report includes income eligibility for Inclusionary units to be BC Housing HILs, but it is not included in the policy.	Add income eligibility to policy.
Replacement Rental	Provision	2022 TAP extends replacement requirement to secondary rental units that are part of a larger site consolidation redevelopment project.	Add new replacement requirements to the Provision section of policy.
Replacement Rental	Applicability	2022 TAP extends eligibility for replacement units to secondary rental units that are part of a larger site consolidation project.	Add new replacement requirements to Applicability section of policy.
Replacement Rental	Number of units to be replaced	2019 report states that vacant units must be replaced, but this is missing from the policy.	Add requirement to replace vacant units to Number section of policy doc.
Replacement Rental	Number of units to be replaced	Existing unit mix is often not provided when a rezoning application is submitted but is needed to determine the replacement unit requirements.	Add wording to provide existing unit mix breakdown with rezoning application to Number section of policy doc.
Replacement Rental	Form	Wording in policy encourages building to minimum unit size rather than above the minimum. Include wording that would encourage building units above the minimum size.	Add “or exceed” to policy doc.
Replacement Rental	Replacement ratio and unit mix	Clarify that unit mix for replacement units should be the same as the existing unit mix to ensure that the returning tenants will receive the same unit type as they rented in the prior building. This will facilitate implementation of TAP. Changes to the unit mix of replacement units would be subject to approval by the General Manager Planning and Development.	Change the unit mix from “generally” to “the same as” what existed before. Make changes subject to the approval of the General Manager.

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Replacement Rental	Accessibility/Unit mix	TAP requires that developers accommodate returning tenants' accessibility needs, but the RUZP does not include this information.	Add wording to the unit mix section about accessibility requirements arising from TAP.
Replacement Rental	Tenants' Right of first refusal	Council has previously directed that tenants be given until move in day to exercise their right of first refusal for the replacement unit. The TAP Guide and housing agreement terms require this, but it is missing from the RUZP.	Add wording as to when tenants have until to exercise their ROFR.
Replacement Rental	Tenants' Right of First refusal	The policy currently says all existing tenants must be offered replacement units. However, not all existing tenants are eligible for benefits under TAP.	Change wording in policy doc to say all eligible tenant(s) must be offered replacement units.
Replacement Rental	Tenant Assistance	Staff report says that tenants must be suitably housed and accommodated during redevelopment. RUZP does not refer to the TAP even though TAP applies to all replacement stream projects.	Add new section about TAP with wording to encourage applicants to contact the Renters Office early in the process and complete the initial TAP requirements to the satisfaction of the Renters Office before the rezoning application will be brought to Council for consideration of Final Adoption.
Replacement Rental	Operation of replacement units	RUZP currently encourages non-profit or third party operation of the replacement units. It would be beneficial for implementing the policy if the proposed operator of the units is indicated as early as possible in the application process, preferably at time of application submission.	Add a new section about operation of the replacement units Encourage non-profit involvement at time of rezoning application.
Replacement Rental	Established rents	2022 TAP added a provision for the calculation of rents for caretaker units. TAP refers to RUZP for required rent levels, so need to add wording about caretaker unit rents for replacement units.	Add wording to Established Rents section of policy.

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Replacement Rental	Affordability	Clarify that a replacement unit that is not tenanted by a returning tenant will convert into an Inclusionary Unit.	Add wording to policy.
Replacement Rental	Affordability	Policy does not specify that a density offset is available to offset the cost of providing the replacement units.	Add wording to section specifying that density offset is available to provide replacement units.
Replacement Rental	Funding	Policy says that government funding is required to achieve greater affordability of the replacement units, but there are challenges with requiring government funding - returning tenants cannot be excluded by funding eligibility requirements. Policy currently suggests that returning tenants who are ineligible for a subsidized unit be housed elsewhere in the development. However, operator will likely own the non-market units, but won't own strata units where returning tenants would be housed and strata units are typically sold prior to occupancy, so wouldn't be available as an alternative.	Remove the requirement for government funding from Replacement Stream.
Replacement Rental	Ownership	Needs clarity on how the units can be owned by a private entity, i.e. ASP?	Revise wording of this section to clarify that units must be subdivided if they are to be owned by a separate entity.
Replacement Rental	Role of Non-Profit	We want experienced non-profit housing providers to operate these units, not just any non-profit organization.	Change from Non-Profit Organization to Non-Profit Housing Provider.
Replacement Rental	Role of Non-Profit	As non-profit involvement with replacement units is unlikely, consider being silent on whether it is preferred or not.	As this section is less about the role of the non-profit and more about the operations in the event of no non-profit, move this info into the new section called Operations.

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Inclusionary Rental	Provision	Policy says each site in a community plan area, but inclusionary units are only required if rezoning.	Specify rezoning site in policy doc.
Inclusionary Rental	Form	Section is silent on unit size. To be consistent with the replacement units section, add same wording about minimum unit sizes.	Add wording to be consistent with replacement stream.
Inclusionary Rental	Development Density	The inclusionary section is missing the development density section that is in the replacement unit section.	Add new section Development Density and use same wording from the replacement stream.
Inclusionary Rental	Operations	Policy is silent on operations and when a rezoning applicant must indicate who will be operating the units.	Add section, use wording from replacement stream.
Inclusionary Rental	Funding	Provincial and Federal funding does not work well with the non-market units created through this policy.	Change wording from required to encouraged or “may be pursued”.
Inclusionary Rental	Funding	Section refers to below-market units instead of non-market units.	Change wording from below market units to non-market units.
Inclusionary Rental	Role of Non-Profit Organizations	This section is redundant with the addition of the operations section.	Delete this section.
Rental in Commercial	Development density	Clarify that the portion of the commercial density that is used for residential rental must never exceed 49% of the portion of commercial density used for commercial uses. Current wording could be misinterpreted as 51% of the base commercial density must be used for commercial purposes before any of the commercial density can be used for residential rental uses.	Change wording to reflect what is required (if necessary).
Rental in Commercial	Ownership	Policy states that the units can be owned privately, but missing reference to subdivision.	Add reference to subdivision.