

Chicago Land Use: A Guide for Communities



Chicago Land Use: A Guide for Communities is the first publication of its kind. This guide aims to provide individuals, communities, and neighborhoods with practical information on the policies, restrictions, and incentives related to the development and use of land in the City of Chicago. Ultimately, the goal is to empower readers to understand how they can influence and shape important decisions that impact their community.



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This guide is a living document. For any comments, questions, or corrections, please contact Clifford Helm at chelm@clccrul.org.

CHAPTER 3: THE AFFORDABLE REQUIREMENTS ORDINANCE

Here's a common scenario in Chicago: A new building is going to be built on a vacant lot in the neighborhood. The developer of the 40-unit building hosts a community meeting, where they present their plans to build 37 luxury rental units and 3 affordable units. The developer mentions that in place of fulfilling the City's requirement to make a higher percentage of their units affordable, the developer will pay a fee into the "in lieu" fund instead.

This story raises a few questions. What does "affordable" mean? If the developer has an obligation to build more affordable housing, why do they simply get to pay a fee instead of building those units? Where do these obligations come from in the first place? And if local residents want more on-site affordable housing built, what options do they have?

The Affordable Requirements Ordinance (the "**ARO**") is a municipal law that governs many of these questions. At the most basic level, the ARO is an "inclusionary zoning" rule that requires many new privately constructed residential housing developments to create affordable rental units and affordable for-sale units.

Critics of the current ARO argue that it has too many loopholes, it doesn't create enough

affordable units, it doesn't put the affordable units where they're needed, and it creates units that are neither affordable nor appropriate for most families in Chicago. Proponents argue that the ARO is as effective as it can be, and that a stricter version would slow or stop new housing developments. The debate about the ARO is central to a core question of equitable development, displacement, and the opportunity for affordable housing in any neighborhood of Chicago.

This Chapter will provide an overview of the ARO and address the core questions raised above.¹

How do community members get to engage with these questions? Are there places where community residents and organizations can encourage affordable housing? The inclusion of affordable requirements is closely tied to **Zoning** and **Aldermanic Prerogative**, which is where decisions on the inclusion of affordable housing in private developments are usually made. Those issues are discussed in Chapter 1, and the connection to the ARO will be highlighted throughout this chapter.

https://www.chicago.gov/content/dam/city/depts/dcd/general/housing/ARO Rules%20 5.2-19.pdf

¹ This chapter is an overview of the ARO. If you are interested in a more detailed manual describing the mechanics of how developers comply with the law, the City publishes a technical set of rules and regulations that describe the requirements in much greater detail:

A. Introduction: Inclusionary Zoning

The ARO is a type of "inclusionary zoning" rule that, like most zoning rules, regulates how private property owners use their land.

Inclusionary zoning gets its name because:

- It <u>requires</u> the inclusion of more accessible affordable units in privately developed residential buildings
- It <u>restricts</u> the ability for landowners to use their land in an "exclusionary" manner that only serves higher income households

These policies are generally designed to (1) create new affordable housing, (2) protect affordable housing stock in neighborhoods experiencing increased cost of living, and (3) to create opportunities to integrate affordable housing options in higher-income and rapidly developing communities.

Many inclusionary zoning rules are tied to giving "bonuses" to the developer. As an example, a policy may allow developers to build bigger buildings than is normally allowed if they include affordable units.

B. Overview of the Affordable Requirements Ordinance

In Chicago, the ARO's stated goal is to create affordable housing by mandating the inclusion of affordable units in new residential developments. These affordability requirements only apply where a development receives some benefit from the

City, like a beneficial zoning change, public financial aid, or the use of City-owned land. And additionally, the rules usually only apply to larger buildings (10 units or more).

The ARO's rules change based on both the type and location of a development. In general, a residential building of 10 or more units that gets a zoning change must set aside 10% of the units as affordable.

However, the details of the ordinance are much more complex than that. A detailed definition might be:

"The Affordable Requirements Ordinance requires many new or rehabbed **private residential housing projects** that create 10 or more new **residential housing units**, at least 10% (and sometimes 20%) of those units must be **affordable** for people earning up to **60% of the Area Median Income**. This only applies to buildings that receive a **zoning change**, use **City-owned land**, or get **City financing** for the building. A **developer** may sometimes, instead of including the units **on-site**, choose to build the affordable units **off-site** or choose to pay an **in-lieu fee**."

But even this definition does not include many of the specifics of the ordinance, most of which are based on location. The remainder of this chapter will go into detail about the requirements of the ordinance.

C. What, When, and Where?

For clarity, this section will mostly refer to the ARO's requirements for <u>rental</u> units. While the ARO also applies to for-sale units, the rules are slightly different and are not discussed in depth in this chapter.

1. What is "Affordable"?

The broad definition of an affordable rental unit is one where a household pays no more than 30% of their income towards total housing costs, including utilities. So, if a household earns \$50,000 per year, then a rental unit which costs \$15,000 per year (which equals \$1,250 per month) would be considered affordable for that household.

Additionally, the ARO sets income amounts for households that would qualify for "affordable housing" under the ordinance. It uses a regional average income number calculated by the federal government, called the Area Median Income or "AMI." In 2019, the AMI in the Chicago area for a one-person household is \$62,400 and increases for larger households. The AMI for a four-person household is \$89,100.

Since the ARO is intended to provide affordable housing for low- and moderate-income households, it specifies that households earning up to **60% of the Area Median Income²** are eligible for the affordable rental units created by the ARO.³

Here's a chart showing AMI based on household size:

Household Size	Yearly Income Based on AMI		
	30% AMI	60% AMI	100% AMI
1	\$18,750	\$37,440	\$62,400
2	\$21,400	\$42,780	\$71,300
3	\$24,100	\$48,120	\$80,200
4	\$26,750	\$53,460	\$89,100

To calculate the affordable rentals, the City makes a few assumptions about how many people will live in an apartment. They say that 1 person lives in a studio (a 0-bedroom unit) and that 1.5 people live in each building for a unit with 1 or more bedrooms. So combining those numbers

² In some instances where the City provides financial aid, some of the units must be affordable for households earning up to 50% of the AMI.

³ For home purchases, it specifies that the buildings be affordable to families earning up to 100% AMI.

of people with 60% AMI, the City calculates the following allowable rents (which include utilities) that can be charged for affordable rental units.⁴

Number of Bedrooms	Maximum ARO Rents at 60% AMI (including utilities)	
0	\$936	
1	\$1,003	
2	\$1,207	
3	\$1,391	
4	\$1,551	
5	\$1,712	

The maximum rents are updated periodically by the City as the AMI for the region changes.

To meet the ARO's requirements, the rents must remain affordable to households earning up to 60% AMI for **thirty years**. This requirement is generally made legally binding upon the land and the building, so that even after the first tenant moves out of an affordable unit, the next tenant(s) will still hopefully benefit from the ARO.⁵

Can we ask for even deeper affordability? The 60% AMI cutoff is beyond the reach of many households in need of housing. A developer may commit to an even more affordable AMI where the community pushes hard for this request. These commitments can be legally binding, since the City will not approve a zoning change prior to ensuring that the ARO is met. Communities have successfully worked with the City and local alderman to ask for greater affordability. However, there is frequently a tension between community residents opposing bigger buildings while wanting more affordable units. In some cases, like the Heartland Café redevelopment in Rogers Park, this might mean that a brand new residential building will not have any affordability requirements.

⁴ There are multiple charts available on the City's website which show variations on rent depending on what utilities are included in rent or not. These charts are available at https://www.chicago.gov/content/dam/city/depts/doh/general/2019 Income and Rent Limits.pdf

⁵ Ongoing enforcement for affordability and eligible tenants in ARO rental units is difficult because there is no mandated reporting requirement. It isn't always clear if the building owners are still following the ARO years after the buildings are built.

2. When does the ARO apply?

The ARO does not automatically apply to all new or rehabbed buildings. In general, it only applies to the construction of residential housing projects (new buildings or substantial rehabs of a building) that (A) create **10 or more new units** and (B) **trigger** the ordinance.⁶

The ARO and naturally occurring affordable housing. A significant amount of the affordable housing in Chicago is considered "naturally occurring affordable housing" or NOAH. These are smaller buildings, under ten units, which are considered affordable because of the rents they tend to charge. However, even when these buildings are torn down, rehabbed, or redeveloped, the ARO does not require any affordable housing component.

The **triggers** are all different types of benefits that the City grants to a developer. In this way, the ARO is structured as an exchange: The City confers a benefit, and in return the developer builds or contributes to affordable housing in some manner.

There are three triggers: (1) When the City approves a zoning change that increases the residential density of a property; (2) when the City sells or transfers real property to a developer and that property is developed into a residential housing project; or (3) when the City provides financial assistance to the development of a residential housing project.⁷

These residential housing projects may be new constructions, for example on vacant lots or after the demolition of an old building, or they could be substantial rehabilitations of existing buildings where the rehab adds 10 or more new units.

In general, a new construction that doesn't need a zoning change, city land, or city financial aid will not trigger the ARO. These types of buildings are usually called "by-right" development or "as of right" development, because a private developer that follows all the zoning, building code, and other current rules is considered to have a "right" to create that development under the current zoning, building, and affordable requirements laws.

⁶A residential housing project may be multiple buildings that are completed in different phases, as long as the City determines that they are all clearly part of the same development. This way, a developer can't build a number of small buildings to avoid having to comply with the ARO.

⁷ It also applies to a smaller group of developments called "Planned Developments" when they occur in the downtown districts of the city.

Trigger #1: Rezoning. A development that asks for a **rezoning** of a property to increase density (the size of the building) <u>and</u> creates 10 or more new units is subject to the ARO. These 10 units could be built either through the construction of a new residential housing project (on a vacant lot or through tearing down a previous building), or by adding them to an existing residential housing project. If a new building is created, then the ARO applies to the whole building. However, if 10 or more new units are added to an existing residential housing project after a zoning change, then only those new units would be subject to the ARO.

A new development in Logan Square at the former "mega-mall" site received a zoning change and will create 220 new residential units, with 10% of those units required to be affordable units. The majority of the units in the development are studios, 1-bedrooms, and 2-bedrooms, and the affordable units will also be majority studios, 1-bedrooms, and 2-bedrooms.

Trigger #2: City Land. The ARO is triggered when a residential housing project creates 10 or more units on land that was previously owned by the City. It also applies when City land is incorporated into a separate or previously existing residential housing project. This requirement is normally enforced by a legal restriction in the sales contract or a deed restriction placed on the land.

Trigger #3: City Financial Assistance. Any project that receives City financial aid for building or rehabbing a residential housing project where 10 new units are created is required to follow the ARO. The City has several financial support programs that may be available to developing private residential housing projects. Some of these programs are intended only for affordable housing, such as the Affordable Housing Opportunity Funds (which are generated through the ARO in-lieu fees, covered below).

In return for using public money for private development, projects that receive financial aid from the City must increase the share of affordable housing units from the standard 10% to 20%.

⁸ For more information on **Zoning**, see Chapter 1 in the Land Use Guide, available here: https://www.clccrul.org/community-land-use-guide

⁹ Specifically, this accounts for situations where City land is used to comply with zoning code, even if the developer isn't building something on the City land (like required parking for the building).

The City sometimes uses Tax Increment Financing¹⁰ ("TIF") to fund the development of private residential housing. Because of some particular concerns about using TIF money to fund private development, those projects have more aggressive affordability goals.

- Rentals in TIF projects: Half of the ARO rental units must be affordable to households earning up to 50% AMI instead of the standard 60%
- Sales in TIF projects: Half of the ARO sales units must be affordable to households earning up to 80% AMI, and half for those earning up to 100% AMI, rather than the standard 120% AMI

What do the triggers mean in context? The ARO does not cover private developments that are built by-right or as-of-right, meaning developments where there is no zoning change required. By-right developments include multi-unit buildings that are replacing commercial properties along mixed-use corridors, rehabs of buildings even if they are removing the long-time tenants, and teardowns of existing buildings. For example, the redevelopment of an old bakery site in Logan Square does not require a zoning change and is therefore not required to include any affordable units, even though the local alderman pushed for including affordable units.

3. Where do developers build the affordable units? Who decides?

The developer generally has three options on how to comply with the ARO:

- Reserve some of the units "on-site" at the development as affordable
- Build the units "off-site" near the development
- Pay an "in-lieu" fee instead of building affordable units (the in-lieu fee is discussed in the next section)

Developers can use a combination of these three methods of compliance, but one quarter of the required affordable units must actually be built. For example, if a developer is required to provide 10 affordable units, they might choose to include

Before 2015, developers could pay to opt out of all of their requirements through an in-lieu fee, described below. The ARO was amended in 2015 to clarify that <u>some</u> affordable units <u>must</u> be built. Now, <u>one quarter of all required affordable units must be built</u>, and in many cases, these are required to be built on-site.

¹⁰For more information on **Tax Increment Financing**, see Chapter 2 in the Land Use Guide, available here: https://www.clccrul.org/community-land-use-guide

3 affordable units on-site (as is required), build another 3 units half a mile away, and pay the inlieu fee for the remaining 4.

Where those ARO units get built depends on where the development is located. For instance:

	On-site requirement	Off-Site possibility
Developments with rental	25% of all affordable units must	Can use off-site for the
units in <u>low-to-moderate</u>	be built on-site	remainder of the affordable
<u>income</u> area		units
Developments with rental	25% of affordable units must be built <u>either</u> on-site OR off-site	
units in <u>higher income</u> area	within two miles that is also a higher income area	
Developments with rental	25% of affordable units must be built either on-site OR off-site	
units in <u>downtown zones</u>	within two miles that is also a downtown zone ¹¹	

When building a unit "off-site," the developer can generally either construct the units themselves, or they could fund the development of an off-site unit. In most cases, the units must be built within a certain radius of the original development – and they almost always have to be in a similar-or-higher-income area. The off-site rules vary depending on where the original development is built.

When providing some of the "on-site" units as affordable, the developer must keep substantially the same building standards for the on-site affordable units as the market rate units. They also generally have to be the same ratio of unit sizes – so a developer couldn't say all the multi-bedroom units are market rate units but designate all the studios as affordable units.

To further complicate this, there are sections of the city called "Pilot Areas" that have different rules about the on-site, off-site, and in-lieu fee requirements. These Pilot Areas are discussed below.

The decision of where the units will be built, and if an in-lieu fee will be used instead, is normally made in a negotiation between City staff, the alderman, and the developer prior to any zoning change required from the City.

¹¹ Different rules apply to for-sale developments that are built in a downtown district.

One challenge to equitably building affordable housing is the culture of "Aldermanic Prerogative." Communities that resist affordable housing frequently work to block the inclusion of affordable units in private developments by utilizing the significant local control that aldermen wield, referred to as "Aldermanic Prerogative." For more information, see Chapter 1 in this guide and the report "A City Fragmented," created by the Chicago Area Fair Housing Alliance and the Shriver Center on Poverty Law.

D. Alternative to Compliance: In-Lieu Fees

Developers for most projects can choose to pay an in-lieu fee instead of building or providing some of the required affordable units. Generally, one-quarter of all the required affordable units still must be built, but the developer can "pay-out" of the remaining requirement. For instance, if a developer builds a 40-unit building and is required to build 4 affordable units, it may instead choose to build 1 of the units on-site and pay the in-lieu fee for the other 3.

The fees are collected by the City and used in two ways:

- The Affordable Housing Opportunity Fund ("AHOF") is used to fund and develop affordable housing across the City. The City generally uses this money to fund non-profit developers who are creating entirely affordable developments. This fund is almost entirely financed by the ARO in-lieu fees.
- **The Low-Income Housing Trust Fund** is used to subsidize rents for people that are making 30% or less of the AMI. This fund has other sources of money, but in recent years the ARO in-lieu fees have comprised most of its funding.

The in-lieu fee is one of the major sources of contention for affordable housing advocates. Many people argue that the fee is counter-productive and makes the ARO an ineffective policy. They point to a few main criticisms of the fee structure:

- **It's too cheap.** The in-lieu fee cost is not nearly high enough, so the developers are almost always going to generate significantly more profit from paying the in-lieu fee than from including affordable units, creating an incentive to pay the fee instead.
- **It keeps Chicago segregated.** By enabling developers to build fewer on-site units, the in-lieu fee <u>further</u> removes affordable housing from more affluent areas, continuing to deepen the economic and racial segregation in Chicago.
- It makes it easier for the NIMBYs to block affordable housing. Community members who do not want affordable housing near them can put pressure on the local alderman to lower the total number of affordable housing units included in a building.

So why did the City choose to create the ARO with an opt-out provision? Keeping the opt-out option has two significant recurring arguments: 1) Not allowing an opt-out might slow down the development of all housing and 2) The fees generated can be used by the City for important housing issues that wouldn't be funded otherwise. Whether these statements are true or not – or if they outweigh the potential policy cost of removing an opt-out – is debated.

Even though the ARO may provide significant funding for affordable housing programs through its in-lieu fees, the total funding for these programs has stayed relatively constant. Before the ARO, the affordable housing programs were funded by the City's general corporate fund, with \$32 million dedicated to the Department of Housing in 2008. In 2019, the City dedicated only \$4 million to the Department of Housing and the programs it supports, with the bulk of the funding for those programs coming from the ARO fees.

E. ARO Pilot Areas

The ARO designates some areas of the city with a different set of rules. These so-called "ARO Pilot Areas" were designed based on the active private development occurring there. They generally have 3 or 5-year "sunset" provisions, and once they expire the areas will return to the regular ARO rules, unless they are re-approved. More information for each Pilot Area (and the source of the maps below) can be found on the <u>City's ARO overview website</u>. 12

1. Milwaukee Corridor Pilot Area

The Milwaukee Corridor Pilot runs northwest from near downtown along Milwaukee Avenue up through Logan Square. It generally increases the amount of affordable units required in a building and does not permit the in-lieu fee, **BUT** it allows some flexibility around the eligibility of households moving into the building.



¹² https://www.chicago.gov/city/en/depts/doh/provdrs/developers/svcs/aro.html

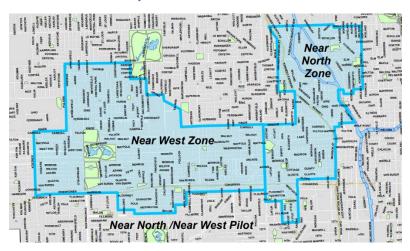
In part because of this extra flexibility, this pilot has been criticized for encouraging the creation of studios and 1-bedroom units, which do not serve most of the long-term residents in the area.

The Milwaukee Corridor Pilot expires on December 31, 2020.

It makes the following changes to the basic ARO rules:

- NO option to pay the in-lieu fee (all units must be built)
- If all units are built on-site, 15% of all units must be affordable (instead of 10%)
- If the units are built off-site, 20% of all units must be affordable (instead of 10%)
- Rents are still priced at 60% of AMI
- People earning up to 80% of AMI are eligible to live in the affordable units

2. Near West Side/Near North Side Pilot Area



The Near West and Near North Pilot areas border the southern and eastern ends of the Milwaukee Pilot Area. Like the Milwaukee Pilot, it removes the in-lieu fee options. It also increases the number of affordable units required – but adds flexibility for the "extra" units created on top of the standard ARO rules.

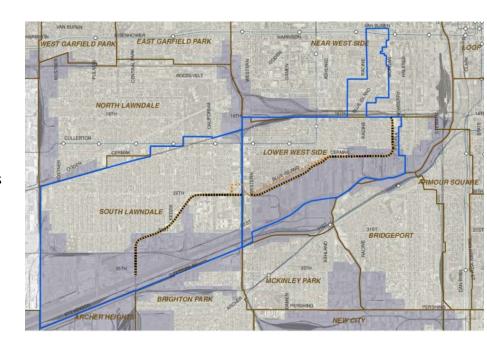
The Near West Side/Near North Side Pilot Area expires on December 31, 2020.

It makes the following changes to the basic ARO rules:

- NO option to pay the in-lieu fee
- All units must be built either on-site or within the pilot area
- Increases the affordable units required to 20% (for the Near North) and 15% (for the Near West)
- Creates <u>two</u> different sets of affordable rentals. The first set is consistent with the ARO and maintains eligibility at 60% AMI. The second set of affordable rentals can be built anywhere in the Pilot Area and rented for up to 100% AMI.
- Includes bonus incentives for family sized housing (this amendment was added a year into the pilot)

3. Pilsen/Little Village Pilot

The Pilsen/Little Village Pilot Area increases the requirement of affordable units from 10% to 20%. and partially eliminates the in-lieu fee. It also does not allow building "off-site" units. The Pilot Area also encourages multi-bedroom units by providing a bonus to the developers that create them. Finally, the Pilot Area emphasizes other housing programs in order to help preserve affordable units in smaller buildings that are not subject to the ARO, although it's still too early to determine the effectiveness of that model.



The Pilsen/Little Village Pilot Area expires on December 31, 2023.

The Pilsen/Little Village Pilot Area makes the following changes to the basic ARO rules:

- Increases the affordable units required to 20% (from 10%)
- Requires half of the affordable units to be built on-site
- Does not allow off-site building
- Increases the in-lieu fee cost by about \$50,000 per unit
- Gives a "bonus credit" for 2 bedroom units and a larger bonus for 3+ bedroom units

F. Outreach, Enforcement, and Renting Units

1. Leasing the Affordable Units

Who gets to live in the affordable units? How are they located and advertised? What happens if a household moves into a unit when they qualify, but later their income increases and they are no longer eligible for the unit?

Prior to renting out any of the affordable units, the developer has to meet with the City's Department of Housing to review the process for marketing and leasing the affordable units. They are then required to submit a **marketing plan**, which conforms to Chicago's Residential Landlord and Tenant Ordinance and the Fair Housing Ordinance.

When leasing the units, the maximum rent amount and the eligible AMI for all <u>new tenants</u> must be approved by the City's Department of Housing. When a new household signs a lease for an

affordable unit, the developer will request verification from the Department of Housing that the household qualifies for the affordable unit. Tenants that are currently residing in a unit, even if their lease expires and they need to sign a new one, will not need to have their income approved again. However, they will have to get verified whenever a new tenant is <u>added</u> to the lease.

This means that tenants generally only need to be income eligible when they move into an affordable unit – and will not need to have their income eligibility checked every year. So if a household was earning 55% of the AMI when they moved in, but they later increased it to 65% of the AMI and no new tenants moved into the unit, they would not be required to move out of the unit.

The ARO does not require landlords to have different application review processes for affordable units, which can cause some problems. For example, building managers might still require a credit check¹ for the affordable units, making those units difficult to access for the ARO's intended renters. Relying heavily on credit scores might also create a disparate impact on certain communities.

2. An alternative: "Authorized Agencies" and the Chicago Housing Authority

In some cases, a developer can sell or lease the affordable units required by the ARO to an "Authorized Agency" such as the Chicago Housing Authority, which will fulfill the affordable obligations. Developers are even encouraged to let an Authorized Agency control the on-site affordable units: If a developer gives an Authorized Agency control of the required on-site units, then the developer will get a reduction of its in-lieu fees.

G. The ARO's Success and Conclusion

The ARO is a complex piece of legislation that affects people, communities, residential housing developers, and the city as a whole.

In 2018, a community organization <u>requested information on the number of affordable units</u> <u>created through the ARO</u> from the time the amended ARO went into effect (fall of 2015) through the first quarter of 2018.¹³ It found that from 2015 to 2018 only 194 affordable units were built on-site at private developments. Extended to a five-year period, it projects to create 431 units by private developers on-site. The City's stated goal of creating affordable units is

¹³ https://www.chicagotribune.com/news/ct-met-affordable-housing-20180518-story.html

more than 3 times that number, some of which have been built through the City's administration of the in-lieu fees.

While the City may ultimately reach its goal through units built and subsidized by the in-lieu funds, the vast majority of those units will be located in areas that are economically stagnant and racially segregated.

Determining if the ARO is a successful policy depends on the goals of the ordinance. Is it about building affordable housing that is integrated within new private development? Or is it about taking fees from private developers to create and support affordable housing across the city, that isn't tied directly to where major development is happening?

Inclusionary zoning rules are frequently enacted to address not only housing affordability, but also to address a history of housing policies and private development practices that exclude low and moderate-income residents from certain neighborhoods. In Chicago, this history has contributed to one of the nation's most racially and economically segregated urban maps. Chicago's ARO provides some attempt to address these important issues. What has it done well? Where has it come up short? What other options are there? The answers to these questions are up for debate and worth further investigation.

The ARO, like many other land use and development policies in Chicago, is an important policy for concerned community members to understand as they advocate for equitable development across the city.

Relevant Links

City Information Page (including the ordinance):

https://www.chicago.gov/city/en/depts/doh/provdrs/housing_resources/svcs/affordable-requirements-ordinance.html

Table of Affordable Rents:

https://www.chicago.gov/content/dam/city/depts/doh/general/2019 Income and Rent Limits.p

AMI Chart:

https://www.chicago.gov/city/en/depts/dcd/supp_info/area_median_incomeamichart.html

City of Chicago's ARO FAQ:

https://www.chicago.gov/content/dam/city/depts/dcd/general/housing/ARO_FAQs.pdf

2015 ARO Zones map:

https://www.chicago.gov/content/dam/city/depts/dcd/general/housing/2015 ARO Zone Map J ULY 28 2015.pdf

2019 In-Lieu Fee Table:

https://www.chicago.gov/content/dam/city/depts/dcd/general/housing/ARO_Inlieu_fee_table_Jan_2019.pdf