

Property Accountability & Occupancy Compliance Initiative

Implementation-Legal Matrix

Purpose: Provide a concise reference identifying the principal program components, required legal and administrative work, anticipated Council action, responsible parties, resource impacts, and recommended implementation sequence. This matrix is a planning document and does not constitute final program adoption or legal authorization.

Program Component	Purpose / Proposed Action	Legal / Legislative Requirements	Administrative / Operational Requirements	Council Action	Lead Responsibility	Staffing / Resource Impact / Phase
Existing Vacant Building Registry Review	Review and improve the existing Chapter 34 registry, ownership records, reporting, inspections, fee collection, monitoring, and enforcement follow-up.	Many improvements may be administrative. Confirm each proposed change with the City Attorney; amend Chapter 34 only where necessary.	Audit current registry; identify missing or outdated records; review fees, reporting, inspection, and enforcement procedures; improve interdepartmental coordination.	Receive findings and consider any later Code or fee amendments.	City Manager; Planning, Development and Codes; City Attorney; Finance/Clerk as needed.	Can begin with current authority, but requires staff time and record review. Phase 1.
Residential Rental Registration	Create a complete inventory of rental properties and units and require current ownership, responsible-party, and local-contact information.	New local law required. Define scope, exemptions, registration, renewal, enforcement, due process, appeals, and authority to charge fees.	Develop application, database, renewal cycle, notices, payment process, owner outreach, and internal procedures.	Provide policy direction; later introduce, hold a public hearing on, and adopt a local law; establish fees by resolution.	City Manager; City Attorney for legal drafting; Planning, Development and Codes for operational design.	Requires administrative support, Code Enforcement capacity, software, legal work, and cost analysis. Phase 2.
Ownership and Responsible-Party Disclosure	Require sufficient information to identify owners, LLC members/managers, agents, local contacts, and persons responsible for compliance.	Definitions and disclosure requirements should be included in the registration law. Affiliated ownership concepts must be carefully defined.	Establish required data fields, update deadlines, verification procedures, and standards for local contacts.	Approve requirements as part of the future registration law.	City Attorney; Planning, Development and Codes; Assessor/Clerk support as appropriate.	Primarily administrative workload and database capacity. Phase 2.
Residential Inspection Coordination	Integrate registration with the existing three-year inspection cycle while maintaining inspection fees separately from registration fees.	Coordinate with Chapter 33 and State inspection requirements. Any new authority or procedures should be included in law or policy as appropriate.	Link registration records to inspection scheduling, inspection history, corrections, follow-up inspections, and certificates.	Consider any necessary Code amendments and fee schedule changes.	Planning, Development and Codes; City Attorney; Finance.	Existing six-month residential backlog must be addressed. Additional CEO capacity needed. Phases 2-3.

Program Component	Purpose / Proposed Action	Legal / Legislative Requirements	Administrative / Operational Requirements	Council Action	Lead Responsibility	Staffing / Resource Impact / Phase
Risk-Based Inspection Prioritization	Maintain routine cycles for compliant properties while allowing more frequent attention to properties with documented recurring or significant concerns.	Objective criteria, notice, correction procedures, and appeal protections are needed if classifications affect rights, fees, or public status.	Develop measurable risk factors, documentation standards, review procedures, and inspection-priority rules.	Approve any legislative standards; receive future policy recommendations.	Planning, Development and Codes; City Attorney; Fire/Police input as appropriate.	Additional inspection and administrative capacity required. Initial focus on backlog and high-risk properties. Phase 3.
Commercial Property Registration	Create reliable ownership, responsible-party, management, emergency-contact, and occupancy information for commercial and mixed-use properties.	No general legal barrier identified, but a separate local law or coordinated legislative framework will be needed to define scope, exemptions, duties, fees, and enforcement.	Develop registration fields, ownership and tenant records, update procedures, emergency contacts, and coordination with Fire and Planning.	Future policy direction, local law consideration, and fee action.	City Manager; City Attorney; Planning, Development and Codes; Fire Department.	Would add substantial administrative work and must account for the Fire Department commercial inspection backlog. Phase 4.
Commercial Change-of-Tenancy / Occupancy Coordination	Improve review when commercial spaces change tenants, operators, uses, or occupancy classifications and prevent repeated occupancy with unresolved conditions.	Must distinguish a simple tenant change from a change in use or occupancy regulated by State Code. Legal and procedural review required.	Create a coordinated intake/review process among Planning, Codes, Fire, and other departments; identify when zoning, site plan, parking, signage, building, or fire review is triggered.	Consider any required local law or Code amendments after procedures are defined.	Planning, Development and Codes; Fire Department; City Attorney; Engineering as needed.	Requires interdepartmental staff time and clear workflow. Phase 4.
Centralized Property Tracking / Software	Create a coordinated system for ownership, registration, inspections, complaints, violations, vacant buildings, occupancy, fees, and enforcement history.	Address records retention, FOIL, privacy, access, and procurement/contract requirements. Centralization does not change FOIL status.	Evaluate existing systems, including Cloudpermit; define user roles, data fields, public functions, payment tools, mobile access, training, and maintenance.	Authorize funding, procurement, contracts, or budget amendments as needed.	City Manager; Planning, Development and Codes; IT; Finance; Fire; Clerk; City Attorney.	Software licensing, implementation, training, data migration, and ongoing administration required. Phases 1-3.
Public Registry / Compliance Recognition	Provide appropriate public registration information and potentially recognize owners or properties with strong compliance records.	Public records are generally subject to FOIL. Any rating or recognition system must be objective, data-driven, supported by notice and appeal procedures, and legally reviewed.	Determine what information should be publicly displayed; establish update, correction, and review procedures.	Future policy direction and possible legislative authorization.	City Attorney; City Manager; Planning, Development and Codes; Clerk/IT.	Not an initial implementation priority. Requires reliable data and staff capacity. Phase 5.

Program Component	Purpose / Proposed Action	Legal / Legislative Requirements	Administrative / Operational Requirements	Council Action	Lead Responsibility	Staffing / Resource Impact / Phase
Corrective-Action Plans and Enhanced Monitoring	Require measurable corrective steps for properties with significant or repeated documented compliance concerns.	Specific authority, triggers, notice, compliance periods, hearing/appeal rights, and enforcement consequences must be drafted.	Develop standardized plans, milestones, inspection follow-up, documentation, and closure criteria.	Adopt legal authority and any necessary procedures after detailed proposal is developed.	City Attorney; Planning, Development and Codes; Fire/Police as applicable.	Creates added inspection, documentation, legal, and court workload. Phase 5.
Chronic Noncompliance and Cross-Portfolio Review	Identify patterns of recurring noncompliance across commonly owned or controlled properties and prevent owners from avoiding accountability through multiple entities.	Objective thresholds and carefully defined common ownership/control standards are required. Due process must be provided before enhanced consequences.	Develop ownership-verification methods, quantitative thresholds, review procedures, and documentation standards.	Future legislative consideration after objective standards are developed.	City Attorney; City Manager; Planning, Development and Codes; Assessor/Clerk support.	Complex legal and data workload; not an initial priority. Phase 5.
Enforcement, Suspension, Revocation, and Appeals	Establish fair and effective remedies for failure to register, repeated violations, unsafe conditions, nonpayment, or failure to complete corrective action.	Local law must define violations, penalties, notice, cure periods, hearings, appeals, emergency authority, reinstatement, and cumulative remedies consistent with State law.	Develop notices, hearing procedures, appeal routing, enforcement workflow, court coordination, and recordkeeping.	Adopt the enabling law and penalty structure; future fee or policy action as needed.	City Attorney for drafting; City Manager; Planning, Development and Codes; City Court/other departments as appropriate.	Significant legal, administrative, inspection, and court workload. Phases 2-5 depending on component.
Tenant Relocation / Owner-Caused Unsafe Conditions	Evaluate whether protections or relocation assistance should apply when lawful tenants are displaced by owner-caused unsafe conditions.	Substantial additional legal analysis required because of landlord-tenant law, disputed responsibility, lease provisions, due process, and possible State-law limitations.	No operational program should be developed until legal authority and scope are established.	Future policy consideration only after legal review.	City Attorney; City Manager; Planning, Development and Codes; outside partners as appropriate.	Not recommended for initial implementation. Potentially significant financial and administrative impact. Phase 5 or later.
Fees and Cost Recovery	Establish a defensible cost-recovery structure for registration and administration while keeping registration fees separate from inspection fees.	Authority to charge should be codified; fee amounts should generally be established by Council resolution. Fees must reasonably relate to actual program costs and not function as a tax.	Complete startup and annual cost analysis covering staff, software, processing, notices, records, inspections, enforcement, training, and legal support.	Adopt fee authority in law; establish and amend fee amounts by resolution.	City Manager; Finance; Planning, Development and Codes; City Attorney.	Revenue must support actual program costs. Complete before final fee recommendation. Phases 1-2.

Program Component	Purpose / Proposed Action	Legal / Legislative Requirements	Administrative / Operational Requirements	Council Action	Lead Responsibility	Staffing / Resource Impact / Phase
Code Enforcement Staffing	Add capacity to reduce current backlogs, maintain building-permit and construction-inspection services, increase proactive work, and support the new initiative.	No separate local law anticipated; positions, duties, Civil Service requirements, and budget authority must be confirmed.	Evaluate adding up to two full-time Code Enforcement Officers. At least one should have an alternative Tuesday-Saturday schedule, potentially 10:00 a.m.-6:00 p.m.	Authorize positions and funding through the budget or later Council action.	City Manager; Planning, Development and Codes; Finance; Civil Service/HR.	One additional officer may be the minimum for phased implementation; two provide a more sustainable model. Needed before full implementation.
Administrative / Clerical Support	Provide dedicated capacity for applications, ownership records, renewals, payments, notices, scheduling, public inquiries, databases, and program reporting.	No separate local law anticipated; position classification and budget authority must be confirmed.	Develop duties and workflow for a full-time clerical or administrative position supporting Planning, Development and Code Enforcement operations.	Authorize position and funding through the budget or later Council action.	City Manager; Planning, Development and Codes; Finance; Civil Service/HR.	Essential to prevent registration work from displacing existing services. Needed before registration launch.
Planning and Development Capacity	Maintain progress on planning, zoning, PCZBA, grants, DRI, economic development, comprehensive planning, and major projects while this initiative is developed.	No separate local law anticipated; position classification and budget authority must be confirmed.	Evaluate a full-time Development Specialist to provide project, planning, research, grant, and implementation support.	Authorize position and funding through the budget or later Council action.	City Manager; Planning and Development; Finance; Civil Service/HR.	Supports department-wide capacity and prevents this initiative from delaying other City priorities. Budget consideration.

Planning note: The recommended phases are intended to establish sequence and workload priorities. Timing should remain dependent on legal readiness, staffing, funding, technology, and administrative capacity. No final program adoption, fee authorization, staffing approval, or implementation action is accomplished through this matrix.