



Pottstown, PA

Municipal Services Study

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Disclaimer

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Disproportionate Impact

Property owners use municipal services, which include police assistance, fire support, public works, and more. At times, all property types use about the same amount of municipal services. Under disparate circumstances, certain property types use a larger proportion of municipal services than others. The proportion of municipal services that different property types use is known as their “**impact**”, which can be measured through an analysis of property types and municipal expenses.

If the average use of services by different property types is equal, the impact on municipal services is “proportionate”.

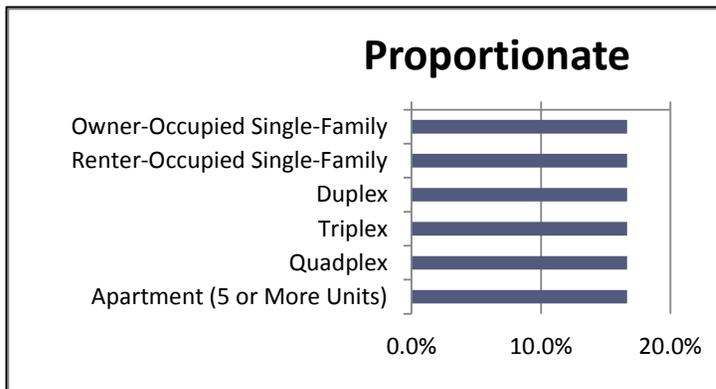


Figure 1: Proportionate Use

If the average use of municipal services by different property types is not equal, the impact on municipal services is “disproportionate”. This creates a potentially unfair situation where some property owners are subsidizing excessive municipal services consumed by other property owners.

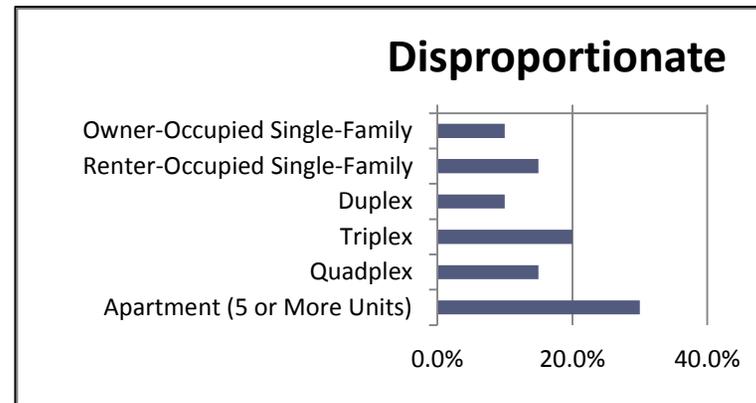


Figure 2: Disproportionate Use

The purpose of this Study is to determine what the impact is on municipal services from different property types in the Borough. If it is determined that the impact is disproportionate, the Borough will also use this study to determine fee rates for a “to be implemented” Better Landlord program.

Executive Summary

This municipal services study (the “Study”) for the Borough of Pottstown (the “Borough”) analyzed Borough-wide consumption of Police, Fire, Public Works, and Code Enforcement by property type using FY 2012-2014 call and service data and determined that rental properties use a disproportionate use of these services when compared to owner-occupied units.

Disproportionate use for a rental property type is determined by calculating a call ratio, which is equal to the proportion of service calls to the number of units, and comparing it to the call ratio for owner-occupied units. Call ratios for owner-occupied properties, single-family detached rentals (SFD), single-family other rentals (condo, townhome, etc.), and multi-unit rentals are shown in Table 1 below. Montgomery County Housing Authority properties are also included for comparison.

	Code Violations	Public Works	Fire	Police
Owner-Occupied	0.16	0.05	0.03	0.49
Housing Authority	0.00	0.00	0.15	1.09
Rental SFD	0.75	0.08	0.06	1.36
Rental Single-Family Other	0.60	0.05	0.08	1.28
Duplex	0.53	0.03	0.05	1.34
Triplex	0.42	0.03	0.03	1.16
Quadplex	0.29	0.03	0.03	1.03
5+	0.07	0.01	0.06	0.77
Non-SFD Rentals	0.26	0.02	0.05	0.99
All Rentals	0.40	0.04	0.05	1.09

Table 1: Call Ratio by Property Type

Those call ratios highlighted in red in Table 1 above indicate that the property type uses a higher proportion of services than owner-

occupied units. For example, the police call ratio for owner-occupied units is 0.49, which means that each owner-occupied unit uses less than 1 police call per fiscal year, or in this case 0.49 calls. Other residential property types use more than 0.49 calls per fiscal year on a per unit basis: SFD rentals were found to make 1.36 calls, other single-family rentals such as condos and townhomes 1.28 calls, duplexes 1.34 calls, triplexes 1.16 calls, quadplexes 1.03 calls, and dwellings with 5 or more units, 0.77 calls. Hence, rental units use a disproportionate amount of police services.

Call ratios highlighted in green in Table 1 above indicate that a property type uses a lower proportion of services than owner-occupied units. Such was the case for Public Works services for all property types except for single-family rentals as well as Code Enforcement for 5+ units and Fire services for quadplexes.

The impact costs for each property type is equal to the product of the call ratio multiplied by a cost per call for Code Enforcement, Public Works Service, Fire, and Police. By passing enabling ordinances the Borough can recover the disproportionate costs imposed by rental units (the difference between the impact costs of rental units and owner-occupied units) by charging landlords an annual disproportionate impact fee.

Cost per call is calculated in Table 2 with the disproportionate impact cost by property type shown in Table 3 below:

	2012	2013	2014*	Total	Cost/Call
Code Budget	NA	\$379,948	\$238,419	\$618,367	\$131.04
Code Violations	NA	3,913	806	4,719	
Works Budget	NA	\$688,799	\$452,508	\$1,141,307	\$542.45
Works Calls	NA	1,393	711	2,104	
Fire Budget	\$1,113,212	\$1,134,732	\$584,137	\$1,718,869	\$886.93
Fire Calls	652	722	564	1,938	
Police Budget	\$5,297,610	\$4,867,110	\$2,802,991	\$7,670,101	\$142.29
Police Calls	21,072	21,852	10,982	53,906	

*(6 months)

Table 2: Cost Per Call

	Public				Total
	Code	Works	Fire	Police	
Housing Authority	(\$20.32)	(\$25.99)	\$103.30	\$85.38	\$142.37
Rental SFD	\$77.93	\$18.40	\$23.11	\$123.55	\$242.99
Rental SF Other	\$58.38	\$0.51	\$41.13	\$112.92	\$212.94
Duplex	\$49.19	(\$7.62)	\$15.63	\$120.98	\$178.18
Triplex	\$34.21	(\$11.46)	\$0.68	\$95.61	\$119.04
Quadplex	\$17.72	(\$7.71)	(\$3.24)	\$77.25	\$84.03
5+	(\$10.88)	(\$19.73)	\$30.92	\$40.11	\$40.43
Non-SFD Rentals	\$13.37	(\$13.97)	\$22.00	\$70.90	\$92.30
All Rentals	\$31.87	(\$4.72)	\$22.32	\$85.99	\$135.46

Table 3: Disproportionate Cost

For comparison purposes, the items highlighted in red and green in Table 1 above correspond to the higher and lower call ratios that are highlighted in red and green in Table 3, respectively.

There are three approaches to assessing a disproportionate impact fee on rental units.

1. By Property Type. As shown in Table 3 above, the per unit disproportionate costs are \$242.99, \$212.94, \$178.18, \$119.04, \$84.03 and \$40.43 for SFD rentals, single-family

other rentals, duplex, triplex, quadplex, and 5+ unit dwellings, respectively.

2. Assess SFD Separately. Another approach is to exclude SFD rentals from the blended rate and assess these dwelling units separately. This approach results in an SFD rental rate of \$242.99 and a combined rate of \$92.30 for all other dwelling units, as shown in Table 3 above.
3. Blend All Property Types. Most municipalities choose a blended rate for all rental units, which is calculated by dividing the total number of service calls to rental units by the total number of rental units in the Borough. This blended rate was calculated to be \$135.46, as shown in Table 3 above.

Regardless of the approach taken, there is no difference to the Borough in the total licensing revenue collected.

Recommendations

Based on the results of the Study and a comparison to other municipalities, it is recommended that the Borough adopt a blended rate of \$135 per unit for those landlords that do not participate in a better landlord program and a reduced fee of \$25 per unit for those landlords that do participate in a Better Landlord program. A business license fee analysis was also outside the scope of this municipal services study, and this analysis does not account for the costs to the Borough of conducting inspections of rental properties. As such, no business license or inspection fee recommendations will be made.

Scope of Municipal Services Study

The scope of this municipal services study includes analyzing FY 2012-2014 service and calls for Police, Fire, Code Enforcement, and Public Works to determine whether property types received a proportionate or disproportionate use of these services.

Methodology of Municipal Services Study

An inventory of all owner-occupied and rental properties within the Borough was performed using the Montgomery County Property records, rental property listing maintained by the Borough, and discussions with Borough employees in order to create a property type database. The total number of units and the percentage of each housing type as a percentage of total housing stock was calculated.

The cost per call for each public service was determined. The cost of Borough services per call for Police and Fire was calculated by dividing the FY 2012, 2013 and the first six months of the 2014 budget amounts by the number of service calls over this period for each department. The cost per call for Code Enforcement, and Public Works was calculated using FY 2013 and the first six months of the 2014 budget amounts.

The incident address of service calls for Police, Fire, Code Enforcement, and Public Works was compared to the property type database to determine those calls that provided service to residents in rental properties and owner-occupied properties. A call ratio, equal to the proportion of service calls to the number of units was then calculated for each property type.

Rental Population

The population of property types for the Borough was gathered from tax roll information provided by Montgomery County as of September 2014. There were 8,704 parcel entries for the Borough. The property types of these parcel entries are shown in Table 4, Table 5, and Table 6:

	Parcels	%	Units
Non-Residential	1,214	14%	0
Residential	7,490	86%	10,829
Total	8,704	100%	10,829

Table 4: Montgomery County Parcels

	Parcels	%	Units	%
Rental	2,645	35%	5,628	52%
Owner-Occupied	4,842	65%	4,842	45%
Housing Authority	3	0%	359	3%
Total Residential	7,490	100%	10,829	100%

Table 5: Montgomery County Residential Parcels

	Parcels	%	Units	%
Single-Family Rental	1,845	70%	1,845	33%
Multi-Family Rental	800	30%	3,783	67%
Total Rental	2,645	100%	5,628	100%

Table 6: Montgomery County Rentals

Multi-Family Rentals

As noted above, there are 7,490 residential parcels within the Borough. Of these residential parcels there are 800 multi-family property parcels and County property records indicate there are 3,783 multi-family rental units, shown in Table 7:

	Parcels	%	Units	%
Duplex	433	54%	866	23%
Triplex	141	18%	423	11%
Quadplex	89	11%	356	9%
5+	137	17%	2,138	57%
Total Multi-Family Rental	800	100%	3,783	100%

Table 7: Multi-Family Rentals

Single-Family Rentals

The Montgomery County property records do not indicate whether a property is owner-occupied or rented. To identify which single-family parcels are rentals, parcels were first compared to a list of rental properties maintained by the Borough. In addition, single-family parcel owners' mailing addresses and situs (property) addresses identified on County property records were compared. A difference between these two entries indicates that the Montgomery County Auditor bill is being mailed to an address other than the property address. It appears reasonable that such properties are being occupied by someone other than the property owner, are vacant properties, bank owned, the owner lives in the home and is having the tax bill mailed to another address, or the parcel has been zoned residential but not developed. For the purposes of this study, such parcels were assumed to be rental properties.

Of the 7,490 residential parcels in the Borough, there are 6,687 single-family parcels that are comprised of 1,845 SF rental properties and 4,842 SF owner-occupied parcels as shown in Table 8. A summary of the housing population for the Borough is shown in Table 9.

	Units	%
Rental		
Rental - Single-Family Detached	1,613	24%
Rental - Single-Family Other	232	3%
Subtotal Rental	1,845	28%
Owner-Occupied	4,842	72%
Total Single-Family	6,687	100%

Table 8: Single-Family Analysis

	Parcels	%	Units	%
Rental				
SFD	1,613	22%	1,613	15%
Single-Family Other	232	3%	232	2%
Duplex	433	6%	866	8%
Triplex	141	2%	423	4%
Quadplex	89	1%	356	3%
5+	137	2%	2,138	20%
Subtotal Rental	2,645	35%	5,628	52%
Owner-Occupied	4,842	65%	4,842	45%
Housing Authority	3	0%	359	3%
Total Residential	7,490	100%	10,829	100%

Table 9: Housing Stock – Single & Multi-Family

Disproportionate Cost Analysis

Cost per Call

Police, Fire, Code Enforcement, and Public Works Service call data were obtained from Borough and County records. The sample period for Fire and Police calls is Jan 2012-Jun 2014 (FY 2012, 2013, 6 months of FY 2014). Because only partial FY 2012 data were obtained for Code Enforcement and Public Works calls, the sample period for these calls is Jan 2013-Jun 2014 (FY 2013, 6 months of FY 2014). The total Borough budget for the sample period by

department was divided by the total number of calls during the sample period to calculate a cost per call as shown below:

	2012	2013	2014*	Total	Cost/Call
Code Budget	NA	\$379,948	\$238,419	\$618,367	\$131.04
Code Violations	NA	3,913	806	4,719	
Works Budget	NA	\$688,799	\$452,508	\$1,141,307	\$542.45
Works Calls	NA	1,393	711	2,104	
Fire Budget	\$1,113,212	\$1,134,732	\$584,137	\$1,718,869	\$886.93
Fire Calls	652	722	564	1,938	
Police Budget	\$5,297,610	\$4,867,110	\$2,802,991	\$7,670,101	\$142.29
Police Calls	21,072	21,852	10,982	53,906	

*(6 months)

Table 10: Municipal Services Cost Per Call

Calls by Property Type

The service and call records were compared to the property inventory database to determine those calls that were specific to rentals, owner-occupied, and other property types.

The nature of each incident was examined to determine whether the call was property specific. Those calls that were not property specific are included in the Excluded Call Type category. Calls that had addresses that did not match the County’s property records for Pottstown are included in the No Address Match category. Calls with incident addresses that match parcels with no living units are included in the Non Residential Address category.

Police (Jan 2012-Jun 2014)	Total Calls	Yearly Average	% of Total	% of Residential
Excluded Calls				
No Address Match	8,690	3,476	16%	NA
Non-Residential Address	16,160	6,464	30%	NA
Excluded Call Type	6,819	2,728	13%	NA
Total Excluded	31,669	12,668	59%	NA
Residential				
Rental				
SFD Rental	5,467	2,187	10%	25%
Single-Family Other Rental	743	297	1%	3%
Duplex	2,896	1,158	5%	13%
Triplex	1,226	490	2%	6%
Quadplex	917	367	2%	4%
5+	4,112	1,645	8%	18%
Subtotal Rental	15,361	6,144	28%	69%
Owner-Occupied	5,900	2,360	11%	27%
Housing Authority	976	390	2%	4%
Total Residential	22,237	8,895	41%	100%
Total Calls	53,906	21,562	100%	

Table 11: Police Service and Call Summary

Fire (Jan 2012-Jun 2014)	Total Calls	Yearly Average	% of Total	% of Residential
Excluded Calls				
No Address Match	245	98	13%	NA
Non-Residential Address	436	174	22%	NA
Excluded Call Type	0	0	0%	NA
Total Excluded	681	272	35%	NA
Residential				
Rental				
SFD Rental	224	90	12%	18%
Single-Family Other Rental	44	18	2%	4%
Duplex	102	41	5%	8%
Triplex	32	13	2%	3%
Quadplex	23	9	1%	2%
5+	344	138	18%	27%
Subtotal Rental	769	308	40%	61%
Owner-Occupied	357	143	18%	28%
Housing Authority	131	52	7%	10%
Total Residential	1,257	503	65%	100%
Total Calls	1,938	775	100%	

Table 12: Fire Service and Call Summary

Public Works (Jan 2013-Jun 2014)	Total Calls	Yearly Average	% of Total	% of Residential
Excluded Calls				
No Address Match	830	553	39%	NA
Non-Residential Address	347	231	16%	NA
Excluded Call Type	248	165	12%	NA
Total Excluded	1,425	950	68%	NA
Residential				
Rental				
SFD Rental	198	132	9%	29%
Single-Family Other Rental	17	11	1%	3%
Duplex	44	29	2%	6%
Triplex	17	11	1%	3%
Quadplex	18	12	1%	3%
5+	37	25	2%	5%
Subtotal Rental	331	221	16%	49%
Owner-Occupied	348	232	17%	51%
Housing Authority	0	0	0%	0%
Total Residential	679	453	32%	100%
Total Calls	2,104	1,403	100%	

Table 13: Public Works Summary

Code Violations (Jan 2013-Jun 2014)	Total Calls	Yearly Average	% of Total	% of Residential
Excluded Calls				
No Address Match	8	5	0%	NA
Non-Residential Address	223	149	5%	NA
Excluded Call Type	0	0	0%	NA
Total Excluded	231	154	5%	NA
Residential				
Rental				
SFD Rental	1,814	1,209	38%	40%
Single-Family Other Rental	209	139	4%	5%
Duplex	689	459	15%	15%
Triplex	264	176	6%	6%
Quadplex	155	103	3%	3%
5+	231	154	5%	5%
Subtotal Rental	3,362	2,241	71%	75%
Owner-Occupied	1,126	751	24%	25%
Housing Authority	0	0	0%	0%
Total Residential	4,488	2,992	95%	100%
Total Calls	4,719	3,146	100%	

Table 14: Code Enforcement Summary

As shown above in Table 11, Table 12, Table 13 and Table 14, rental properties accounted for 69%, 61%, 49%, and 75% of residential Police, Fire, Public Works, and Code Enforcement, respectively. However, rental units comprise only 52% (see Table 5) of the housing unit population. This indicates a disproportionate use of municipal services for Police, Fire and Code Enforcement. Additionally, as shown in Table 15 police calls to rental properties are twice as likely to be in response to violent crime as calls to owner-occupied units. Such calls likely impose a higher cost on the Borough than other call types. However, the data available does not allow for a precise calculation of that additional cost.

	Violent Crime		Other Police		Total
	Calls/Yr	%	Calls/Yr	%	
Rental	180	2.9%	5,965	97.1%	6,144
Owner-Occupied	36	1.5%	2,324	98.5%	2,360
Housing Authority	12	3.0%	379	97.0%	390

Table 15: Police Calls by Type

Residential Cost of Municipal Services

The disproportionate use by property type was calculated by determining the difference between each rental property type call ratio and the SF owner-occupied dwelling unit call ratio for each public service category. This difference was then multiplied by the cost per call for each public service category. The resulting product is the disproportionate impact cost for rental properties. The disproportionate income of Housing Authority units was also calculated for comparison. See the tables below:

	Code Violations	Public Works	Fire	Police
Owner-Occupied Calls/Yr	751	232	143	2,360
Owner-Occupied Units	4,842	4,842	4,842	4,842
Owner-Occupied Call Ratio	0.16	0.05	0.03	0.49
SFD Rental Calls/Yr	1,209	132	90	2,187
SFD Rental Units	1,613	1,613	1,613	1,613
SFD Rental Call Ratio	0.75	0.08	0.06	1.36
Disproportionate Use	0.59	0.03	0.03	0.87
Cost Per Call	\$131.04	\$542.45	\$886.93	\$142.29
Disproportionate Cost	\$77.93	\$18.40	\$23.11	\$123.55

Table 16: Disproportionate Use - SFD Rentals

	Code Violations	Public Works	Fire	Police
Owner-Occupied Calls/Yr	751	232	143	2,360
Owner-Occupied Units	4,842	4,842	4,842	4,842
Owner-Occupied Call Ratio	0.16	0.05	0.03	0.49
SF Other Rental Calls/Yr	139	11	18	297
SF Other Rental Units	232	232	232	232
SF Other Rental Call Ratio	0.60	0.05	0.08	1.28
Disproportionate Use	0.45	0.00	0.05	0.79
Cost Per Call	\$131.04	\$542.45	\$886.93	\$142.29
Disproportionate Cost	\$58.38	\$0.51	\$41.13	\$112.92

Table 17: Disproportionate Use - SF Other Rentals

	Code Violations	Public Works	Fire	Police
Owner-Occupied Calls/Yr	751	232	143	2,360
Owner-Occupied Units	4,842	4,842	4,842	4,842
Owner-Occupied Call Ratio	0.16	0.05	0.03	0.49
Duplex Calls/Yr	459	29	41	1,158
Duplex Units	866	866	866	866
Duplex Call Ratio	0.53	0.03	0.05	1.34
Disproportionate Use	0.38	(0.01)	0.02	0.85
Cost Per Call	\$131.04	\$542.45	\$886.93	\$142.29
Disproportionate Cost	\$49.19	(\$7.62)	\$15.63	\$120.98

Table 18: Disproportionate Use – Duplex

	Code Violations	Public Works	Fire	Police
Owner-Occupied Calls/Yr	751	232	143	2,360
Owner-Occupied Units	4,842	4,842	4,842	4,842
Owner-Occupied Call Ratio	0.16	0.05	0.03	0.49
Triplex Calls/Yr	176	11	13	490
Triplex Units	423	423	423	423
Triplex Call Ratio	0.42	0.03	0.03	1.16
Disproportionate Use	0.26	(0.02)	0.00	0.67
Cost Per Call	\$131.04	\$542.45	\$886.93	\$142.29
Disproportionate Cost	\$34.21	(\$11.46)	\$0.68	\$95.61

Table 19: Disproportionate Use – Triplex

	Code Violations	Public Works	Fire	Police
Owner-Occupied Calls/Yr	751	232	143	2,360
Owner-Occupied Units	4,842	4,842	4,842	4,842
Owner-Occupied Call Ratio	0.16	0.05	0.03	0.49
Quadplex Calls/Yr	103	12	9	367
Quadplex Units	356	356	356	356
Quadplex Call Ratio	0.29	0.03	0.03	1.03
Disproportionate Use	0.14	(0.01)	(0.00)	0.54
Cost Per Call	\$131.04	\$542.45	\$886.93	\$142.29
Disproportionate Cost	\$17.72	(\$7.71)	(\$3.24)	\$77.25

Table 20: Disproportionate Use – Quadplex

	Code Violations	Public Works	Fire	Police
Owner-Occupied Calls/Yr	751	232	143	2,360
Owner-Occupied Units	4,842	4,842	4,842	4,842
Owner-Occupied Call Ratio	0.16	0.05	0.03	0.49
5+ Calls/Yr	154	25	138	1,645
5+ Units	2,138	2,138	2,138	2,138
5+ Call Ratio	0.07	0.01	0.06	0.77
Disproportionate Use	(0.08)	(0.04)	0.03	0.28
Cost Per Call	\$131.04	\$542.45	\$886.93	\$142.29
Disproportionate Cost	(\$10.88)	(\$19.73)	\$30.92	\$40.11

Table 21: Disproportionate Use - 5+ Units

	Code Violations	Public Works	Fire	Police
Owner-Occupied Calls/Yr	751	232	143	2,360
Owner-Occupied Units	4,842	4,842	4,842	4,842
Owner-Occupied Call Ratio	0.16	0.05	0.03	0.49
Housing Authority Calls/Yr	0	0	52	390
Housing Authority Units	359	359	359	359
Housing Authority Call Ratio	0.00	0.00	0.15	1.09
Disproportionate Use	(0.16)	(0.05)	0.12	0.60
Cost Per Call	\$131.04	\$542.45	\$886.93	\$142.29
Disproportionate Cost	(\$20.32)	(\$25.99)	\$103.30	\$85.38

Table 22: Disproportionate Use - Housing Authority

As some municipalities charge the same rate for all rental units, a blended rate, which combines all rental properties together to calculate a rental unit call ratio, is shown in Table 23 below:

	Code Violations	Public Works	Fire	Police
Owner-Occupied Calls/Yr	751	232	143	2,360
Owner-Occupied Units	4,842	4,842	4,842	4,842
Owner-Occupied Call Ratio	0.16	0.05	0.03	0.49
All Rental Calls/Yr	2,241	221	308	6,144
All Rental Units	5,628	5,628	5,628	5,628
All Rental Call Ratio	0.40	0.04	0.05	1.09
Disproportionate Use	0.24	(0.01)	0.03	0.60
Cost Per Call	\$131.04	\$542.45	\$886.93	\$142.29
Disproportionate Cost	\$31.87	(\$4.72)	\$22.32	\$85.99

Table 23: Disproportionate Use - All Rentals

Some municipalities charge SFD units one fee, while charging other rentals a separate fee. The blended rate for non-SFD rentals is shown in Table 24 below:

	Code Violations	Public Works	Fire	Police
Owner-Occupied Calls/Yr	751	232	143	2,360
Owner-Occupied Units	4,842	4,842	4,842	4,842
Owner-Occupied Call Ratio	0.16	0.05	0.03	0.49
Non-SFD Rentals Calls/Yr	1,032	89	218	3,958
Non-SFD Rental Units	4,015	4,015	4,015	4,015
Non-SFD Rentals Call Ratio	0.26	0.02	0.05	0.99
Disproportionate Use	0.10	(0.03)	0.02	0.50
Cost Per Call	\$131.04	\$542.45	\$886.93	\$142.29
Disproportionate Cost	\$13.37	(\$13.97)	\$22.00	\$70.90

Table 24: Disproportionate Use – Non-SFD Rentals

A summary of the disproportionate rental fee by property type and blended rates is provided below in Table 25 and Table 26, respectively:

	Code	Works	Fire	Police	Total
SFD Rental Disp. Cost	\$77.93	\$18.40	\$23.11	\$123.55	\$242.99
SF Other Rental Disp. Cost	\$58.38	\$0.51	\$41.13	\$112.92	\$212.94
Duplex Disp. Cost	\$49.19	(\$7.62)	\$15.63	\$120.98	\$178.18
Triplex Disp. Cost	\$34.21	(\$11.46)	\$0.68	\$95.61	\$119.04
Quadplex Disp. Cost	\$17.72	(\$7.71)	(\$3.24)	\$77.25	\$84.03
5+ Disp. Cost	(\$10.88)	(\$19.73)	\$30.92	\$40.11	\$40.43

Table 25: Disproportionate Use Fee by Property Type

	Code	Works	Fire	Police	Total
SFD Rental Disp. Cost	\$77.93	\$18.40	\$23.11	\$123.55	\$242.99
Non-SFD Rental Disp. Cost	\$13.37	(\$13.97)	\$22.00	\$70.90	\$92.30
All Rental Disp. Cost	\$31.87	(\$4.72)	\$22.32	\$85.99	\$135.46

Table 26: Disproportionate Use Fee – Blended