



# Agenda

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## COMMUNITY DEVELOPMENT COMMISSION MEETING

**Wednesday, July 29, 2015**

**3:30-5:00 p.m.**

**500 Market Street, Suite 200**

**Engine Conference Room**

1. Call to Order
2. Roll Call
3. Approval of Agenda
4. Review of Minutes: June 17, 2015 CDC
5. Proposal for Alternate Compliance for Pulte at Las Soleras (SFHP) – James Siebert & Associates – Continuation from June 17, 2015 meeting (Alexandra Ladd).
6. Items from the Commission
7. Items from the Floor
8. Adjournment

An interpreter for the hearing impaired is available through the City Clerk's office upon five days notice. Please contact 955-6521 for scheduling.

**INDEX OF**  
**CITY OF SANTA FE**  
**COMMUNITY DEVELOPMENT COMMISSION**  
**MEETING**  
**July 29, 2015**

<b><u>ITEM</u></b>	<b><u>ACTION</u></b>	<b><u>PAGE (S)</u></b>
<b>CALL TO ORDER</b>		<b>1</b>
<b>ROLL CALL</b>	<b>Quorum</b>	<b>1</b>
<b>APPROVAL OF AGENDA</b>	<b>Approved</b>	<b>1</b>
<b>APPROVAL OF MINUTES: June 17, 2015 CDC</b>	<b>Approved [as submitted]</b>	<b>2</b>
<b>PROPOSAL FOR ALTERNATE COMPLIANCE FOR PULTE AT LAS SOLERAS (SFHP) – JAMES SIEBERT &amp; ASSOCIATES, INC.</b>	<b>Approved with conditions</b>	<b>2-9</b>
<b>ITEMS FROM THE COMMISSION</b>	<b>None</b>	<b>9</b>
<b>ITEMS FROM THE FLOOR</b>		<b>9</b>
<b>ADJOURNMENT</b>	<b>Adjourned at 5:15 p.m.</b>	<b>9-10</b>

**MINUTES OF THE**  
**CITY OF SANTA FE**  
**COMMUNITY DEVELOPMENT COMMISSION MEETING**  
**Santa Fe, New Mexico**

**July 29, 2015**

A meeting of the City of Santa Fe Community Development Commission was called to order by Rusty Tambascio, Vice-Chair on this date at 3:36 p.m. in the Market Station Offices, 500 Market Street, Suite 200, Roundhouse Conference Room, Santa Fe, New Mexico.

**Members Present:**

Rusty Tambascio, Vice-Chair  
Paul Goblet  
Carla Lopez  
John Padilla  
Silas Peterson

**Member(s) Absent:**

Councilor Ron Trujillo, Chair, excused  
Toby Bott-Lyons, excused

**Staff Present:**

Margaret Ambrosino, Senior Housing Planner  
Alexandra Ladd, Housing Special Projects Manager

**Others Present:**

Edward Archuleta, St. Elizabeth's Shelter and NM Coalition to End Homelessness  
Garrett Price, Pulte Homes of New Mexico, Inc.  
Victoria Dalton, James W. Siebert & Associates Inc.  
Sharon Welsh, The Housing Trust  
Jo Ann G. Valdez, Stenographer

**APPROVAL OF AGENDA**

**Commissioner Peterson moved to approve the agenda as published.  
Commissioner Padilla seconded the motion. The motion passed unanimously by voice vote.**

**DRAFT: SUBJECT TO APPROVAL**

## **APPROVAL OF MINUTES: June 17, 2015 CDC**

**Commissioner Padilla moved to approve the Minutes of the June 17, 2015 CDC Meeting. Commissioner Lopez seconded the motion. The motion passed unanimously by voice vote.**

## **PROPOSAL FOR ALTERNATE COMPLIANCE FOR PULTE AT LAS SOLERAS (SFHP) – JAMES SIEBERT & ASSOCIATES, INC.**

*Commissioner Tambascio abstained from discussion and voting on this agenda item having declared a possible conflict of interest.*

Ms. Ladd referred to the Memo that was included in the Commissioners' packets. A copy is hereby incorporated to these Minutes as Exhibit "A".

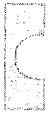
Ms. Ambrosino noted that a letter of support from the New Mexico Coalition to End Homelessness came in after the Commissioners' packets were distributed. She distributed copies to the Commissioners today. A copy is hereby incorporated to these Minutes as Exhibit "B".

### **Background**

One of the goals of the Santa Fe Homes Program (SFHP) is to *"foster economic integration by requiring that developers provide required SFHP units and manufactured home lots on the property proposed for development."* [(SFCC 26-1.33(A))] However, the ordinance also allows for a developer to petition the City Council to comply with the affordability requirement through an alternate means of compliance, *"...off-site construction, cash payment in lieu of constructing or creating the required SFHP units or manufactured home lots or dedication of land suitable for construction or creation of inclusionary units of equivalent or greater value than would be required for onsite construction."* [SFCC 26-1.33(A)]

The alternate means of compliance may be considered if the proposal demonstrates that the project meets the definition of "extreme hardship" which the ordinance defines as: *"a condition occurring as a direct consequence of the SFHP Ordinance which:*

- (a) deprives a property owner of all economically viable use of the subject property taken as a whole; or*
- (b) would require the property owner to lose money on the development taken as a whole and the property owner can demonstrate to the governing body's satisfaction that said loss would be an unavoidable consequence of the SFHP requirement for construction of SFHP units; or*
- (c) the property owner can demonstrate to the Council's satisfaction that complying with the requirements of this chapter would constitute taking property in violation of the Constitution of the United States or New Mexico."* (SFCC 25-1.5)



Staff has requested that the Commission provide a recommendation to the Governing Body regarding the proposal for alternate compliance submitted by James Siebert & Associates on behalf of Pulte Homes.

**Item and Issue**

Pulte homes of New Mexico, Inc. proposes to build a total of 300 market rate homes on a land parcel in Las Soleras. The project is subject to the Santa Fe Homes Program Ordinance (SFCC Chapter 26-1) which requires that 20% (60 homes) are sold at affordable sales prices to income-qualified homebuyers. Five percent (5%) of the total units (15) are to be priced affordably for homebuyers earning from 50-60% AMI. 30 units (10%) priced for homebuyers earning from 65-80% AMI; and 15 units (5%) priced for homebuyers earning from 80-100% AMI. A breakdown of the unit types and pricing were included in the proposal that was distributed in the Commissioners' packets.

Rather than delivering all 60 affordable homes, Pulte Homes requests to satisfy the SFHP requirement through the following:

- Donate six (6) building lots to Habitat for Humanity for construction of homes priced affordably to homebuyers earning no more than 60% AMI. The equivalent value of this donation is calculated through the following:  $\$90,000 \text{ per lot} \times 6 = \underline{\$540,000}$ .
- Donate a four (4)-acre parcel within Las Soleras that is suitable for future construction of a 60-72 unit Low Income Housing Tax Credit project. The value of this parcel is estimated to be  $\$5.00 \text{ square foot} \times 174,240 \text{ (43,560} \times 4 \text{ acres)} = \underline{\$871,200}$ .

Appendix D of the SFHP Administrative Procedures provides a calculation for estimating a fee-in-lieu that is based on MLS sales data to the specific area of Santa Fe. Projects that are proposed in neighborhoods with higher land values pay a higher fee-in-lieu per unit than in more affordable areas of town. For the southwest sector of Santa Fe, this fee is estimated to be approximately \$42,780 per unit for a total fee of:  $\$42,780 \times 60 = \underline{\$2,566,800}$ . (Note: this fee is currently estimated based on 2014 income and real estate sales data and would be adjusted to present day values before being assessed.)

The difference between the fee-in-lieu for 60 units (\$2,566,800) and the estimated value of the donated land (\$1,411,200) is proposed to be compensated by the future subsidy leveraged through the Low Income Housing Tax Credit development on the donated parcel.

Pulte Homes of New Mexico, Inc. would like the CDC to consider the proposal for alternate compliance on the basis that the applicant has stated a general case for the extreme hardship that will be unavoidable if the affordable homes are built. If CDC recommends that the alternate compliance (eg. donated lots are ready-to-build and all land use entitlements for the proposed uses are secured, etc.) to be forwarded to the Governing Body for consideration.



At the June 17, 2015 CDC meeting, a motion was made and passed to table this for continuance of discussion on this action item and reconvene before the City Council meeting. The meeting was originally scheduled for June 26, 2015; however, the Commission rescheduled the meeting to discuss this for today (July 29, 2015).

Garrett Price, Vice President of Pulte Homes of New Mexico, Inc. and Victoria Dalton of James Siebert & Associates were present today to answer any questions that the Commission may have.

Vice-Chair Tambascio asked the members from the public to introduce themselves.

Sharon Welsh said she is with The Housing Trust and their Board of Directors asked her to attend to support for the request/proposal for alternate compliance.

Edward Archuleta said he is a Case Manager at St. Elizabeth's Shelter for the homeless and he is also a member of the NM Coalition to End Homelessness Task Force. He referred to the letter of support from the Director of the Coalition, Hank Hughes.

***Discussion/Questions/Comments:***

Commissioner Goblet asked what came out of the Planning Commission.

Vice-Chair Tambascio asked if the question of the Alternate Means of Compliance brought in front of the Planning Commission.

Mr. Price said they did not discuss this because that is not the purview of the Planning Commission. He said they did walk out of the meeting at 1:00 in the morning with unanimous approval. He noted that there was a lot of quality support but there was a lot of discussion about the park compliance.

Commissioner Padilla said there was significant discussion about the park. He said there were a total of seven items on the agenda to include a General Plan Amendment, annexation, rezoning and electrical transmission lines. He explained that the Alternate Means of Compliance is not purview of the Planning Commission – it is specifically purview of the CDC to make a recommendation to the Governing Body for their final review and approval.

Commissioner Padilla said there was also lengthy discussion about the greenbelt space/the open park space, the phasing of the project and what the projected build-out could possibly be. In the end, the applicant walked out with unanimous approval on all seven items that were submitted before the Planning Commission.

Mr. Price said they also spent a descent amount of time talking about transportation – the timing of Beckner Road construction and access points to Nava Ade. He mentioned that the constituents of the neighborhood were there in support of the project but they were

very concerned about the timing and the connections and traffic patterns.

Commissioner Padilla said there were a number of people from the public presenting and speaking in reference to the project. The concern from the Nava Ade residents is that this could be their immediate relief valve from the congestion and the Planning Commission members tried to be very clear in their deliberations that this approval does not mean that this will relieve their congestion tomorrow.

Commissioner Padilla asked Mr. Price to show the CDC Phase 1 of the Age-Targeted community on the plat. He said there was a lot of discussion specifically about the Age-Targeted and lengthy conversations about a gated community. He noted that he had a question on the need for a gated community and he thinks that Pulte explained this pretty well in that the research, and information that they are seeing from their targeted market was for the desire for that – for security and being able to access that.

Commissioner Goblet asked if the blank spaces on the plat are going to be more commercial or residential.

Mr. Price said three-quarters of the project is planned for commercial and they are only one element of the residential with approximately 295 units. Ross' Peak is another 200 units.

Commissioner Goblet asked if this is something that has already started.

Commissioner Padilla said it came to the Planning Commission for final approval earlier this year. He thinks there are some changes going on with the density of the project.

Commissioner Goblet asked if they will be coming before the CDC at some point in time.

Ms. Dalton said no, they have an affordable housing agreement with the City.

Commissioner Padilla said there could be a possibility that they (Ross' Peak) could come before the CDC in the future.

Vice-Chair Tambascio asked Mr. Price what their commitment for affordable housing would be – the number of units without this in-lieu-of request.

Mr. Price said it would be 60 units (20% of the overall density).

Commissioner Peterson asked who the developer was for Ross' Peak.

Mr. Price said the primary developer is John Mahoney.

Commissioner Peterson asked if they have found a way of developing approximately 200 homes and meeting the affordable housing requirement.



Mr. Price said Pulte/Centex has been building in Santa Fe for over 10 years and have since provided over 600 affordable housing units. He noted that Ross' Peak have not contracted with a builder yet. They are only a developer.

Vice-Chair Tambascio asked Ms. Welsh what she is seeing since the downturn of the housing market.

Ms. Welsh said it is not as robust as it was before 2007. She said based on a Gallup poll that was done recently, 41% of non-owners do not want to purchase a home, but on the other side 59% do.

Ms. Welsh explained that the HOMES Program is oriented towards first-time homebuyers, first responders, a younger clientele and she does not believe the higher homeowner association fees and a gated-community feature would appeal to that clientele. She noted that homeowner association fees can escalate a mortgage payment by \$200.00. She mentioned that some of the affordable rental units that are available in Santa Fe are three-story and this is not a preference for people with small children. They also do not want to take their groceries upstairs. She said there is a huge need for affordable housing units in Santa Fe and this is why The Housing Trust Board is supporting this proposal.

Vice-Chair Tambascio said the Commission has the letter of support from the NM Coalition to End Homelessness but she would like to hear from Mr. Archuleta why they are supporting this request.

Mr. Archuleta said as Ms. Welsh indicated, there is a dire need for affordable rental housing in Santa Fe. He said as a Case Manager for St. Elizabeth's Shelter, part of his job is getting people into homes or apartments and it is almost impossible to find rental housing that they can afford. This is why they are supporting this.

Vice-Chair Tambascio asked if the Commissioners had any more questions.

Commissioner Lopez said she came away from the last meeting thinking that the chances of these rental units being built are pretty iffy.

In response, Ms. Welsh said she is sorry that she left that impression. She said the good news is that they will be built as long as the City owns it and it is only a matter of time before the priorities statewide come here. She said it could be this year if we are ready to go this year and the fact that the City would be donating the land enhances its chances because it is highly competitive (to receive the Low-Income Housing Tax Credit funding) and only five communities will get it statewide.

Commissioner Lopez said there really isn't a guarantee and there are probably at least five communities who will apply for the tax credit project funding.

Commissioner Padilla asked Mr. Price to point out (on the plat) where the 4-acre

site is that is suitable for future construction of the 60-70 unit Low Income Housing Tax Credit project.

Mr. Price noted that the drawings were included this in the packet at the last CDC meeting.

Commissioner Padilla asked if there is proposed bus service that will go up Roadrunner Road, or is it only going to be down on Beckner Road.

Ms. Dalton said as far as she knows, there is not a proposed bus service route for Roadrunner Road.

Commissioner Padilla said the conversation that the Commission probably wants to have is the possibility of a larger parcel of acreage for the units that Pulte is proposing to provide to Habitat.

Commissioner Peterson said the proposal for the total fee-in-lieu of the compliance would be \$2.5 million and the difference between the fee and the donated land is about \$1 million and the proposal indicates that the difference would be made up by the value created by the Low Income Housing Tax Credit.

Mr. Price said this includes a multiplier of \$14 million in some cases, which is pretty significant.

Commissioner Peterson said it seems to him that the value is actually created by the developer who is going to build the property and that this alternate compliance would basically be allowing what it would cost to comply by \$1 million.

Mr. Price said in doing the math and them being a public corporation, they questioned the value or dollar amount of compliance ultimately. He said in looking at the Housing Needs Assessment and having been the largest private provider of affordable units in this market in the last decade, they are not selling as much of the single-family detached units. This has become a challenge for them in terms of a business model.

Mr. Price said in seeing the need for rental units, it feels like this is a good beta test. This would provide an opportunity for affordable rental housing, which was identified as one of Santa Fe's critical housing needs in the 2013 Housing Needs Analysis/Assessment.

Commissioner Goblet asked Mr. Price how much it costs them to subsidize a house.

Mr. Price said \$38,000.00. He said when the Ordinance was put in place years ago, the median price in household costs was \$556,000.00 and now at the same square footage, the median price is about \$300,000.00.

Commissioner Peterson said he does not dispute that the need is for rental properties but as a Commissioner, he is looking at this fee-in-lieu of compliance is

\$42,000.00 a unit. So, to comply with the Ordinance you would have to build 60 units at \$42,000.00, which totals \$2.5 million. He questioned whether this adds up to \$2.5 million of value for the City.

Mr. Ladd explained that rental units and home ownership have different values for the City.

Commissioner Peterson said they need to figure out how to create a \$2.5 million worth of value and it seems to him that we are coming out short with the way this proposal is written.

Commissioner Padilla said the proposal is about \$1 million short.

Mr. Price said this is why they are seeking the Alternate Means of Compliance and why they are here.

Commissioner Goblet asked if there is a possibility that this would not get approved from the standpoint of zoning – the affordable housing.

Ms. Welsh said it is already zoned.

Commissioner Padilla added that this is why they are looking at that area, that tract of land. The entitlements are there.

Commissioner Goblet said then there is a value to that. He said you could see where there would be a trade-off – if the tract of land was bigger (maybe ½ an acre larger) and you could put more units in.

Vice-Chair Tambascio asked Mr. Price if they could switch the parcel for rental housing to 4.5 acres.

Ms. Ladd said this is a negotiation in some ways and maybe the Commission could request that Pulte build six or seven additional rental housing units.

Mr. Price said there could be a challenge in providing another seven units.

Commissioner Padilla said at the end of the day, this Commission should come up with a recommendation to the Governing Body.

Mr. Price asked if he could step out to make a phone call to Pulte Corporation to discuss the proposal of the 4.5 acres and he was granted permission.

Mr. Price came back into the meeting and said Pulte Corporation is in agreement with switching the 4 acres to 4.5 acres and to pay for the costs associated with preparing a Low Income Housing Tax Credit application, not to exceed \$100,000.00.

After discussion on the recommendation that the Commission could make, the following motion was made:

**Commissioner Goblet moved to recommend approval of Pulte's proposal for Alternate Compliance with the following amendments:**

- 1) The parcel for rental housing is increased by ½ acre for a total parcel size of 4.5 acres, with a present-day value at \$5.00/square foot, which totals \$980,100 (\$43,560 x 4.5 acres);
- 2) The developer will pay for the costs associated with preparing a Low Income Housing Tax Credit application (includes: preliminary design, engineering and environmental assessments), not to exceed \$100,000.00;
- 3) The value of the alternate compliance (land cost + application cost) equals 10% of the estimated value of the future rental housing project (estimated to be approximately \$14 million).

**Commissioner Lopez seconded the motion. The motion passed with Commissioner Peterson voting in opposition.**

*As noted previously, Vice-Chair Tambascio abstained from voting having declared a possible conflict of interest.*

Commissioner Goblet asked Commissioner Peterson why he is in opposition.

Commissioner Peterson said he feels like the City will pay \$1 million for ½ an acre. He felt that the dollar amounts do not work for the value that the City will be getting.

## **ITEMS FROM THE COMMISSION**

There were no items from the Commission.

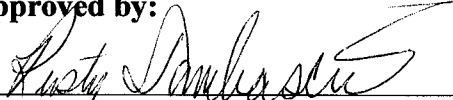
## **ITEMS FROM THE FLOOR**

Ms. Ambrosino said the next meeting is September 16, 2015 and this is when the Commission will be asked to review and possibly approve the CAPER. She asked if the Commissioners will be available and only three Commissioners were available; therefore there will not be a quorum. They will check with Commissioner Bott-Lyons and Councilor Trujillo to see if they are available for September 16<sup>th</sup>.

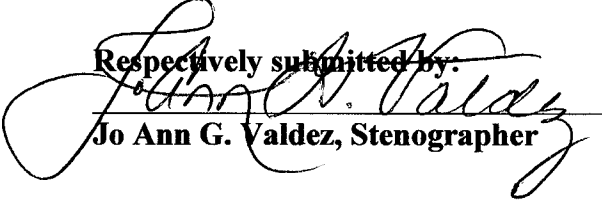
## **ADJOURNMENT**

Its business being completed, Commissioner Peterson moved to adjourn the meeting, second by Commissioner Padilla, the meeting adjourned at 5:15 p.m.

Approved by:

  
\_\_\_\_\_  
Rusty Tambascio, Vice Chair

Respectively submitted by:

  
\_\_\_\_\_  
Jo Ann G. Valdez, Stenographer

# City of Santa Fe, New Mexico

## memo

EXHIBIT

A

**Date:** June 9, 2015  
**To:** Members of the Community Development Commission  
**Via:** Kate Noble, Interim Director *KN*  
Housing and Community Development Department  
**From:** Alexandra Ladd, Special Projects Manager *all*  
Housing and Community Development Department  
**Re:** Request for Alternate Compliance for Pulte at Los Soleras

### ACTION REQUESTED

Provide recommendation to the Governing Body regarding the attached proposal for alternate compliance submitted by James Siebert & Associates on behalf of Pulte Homes.

### BACKGROUND

One of the goals of the Santa Fe Homes Program (SFHP) is to "foster economic integration by requiring that developers provide required SFHP units and manufactured home lots on the property proposed for development." [(SFCC 26-1.33(A))] However, the ordinance also allows for a developer to petition the City Council to comply with the affordability requirement through an alternate means of compliance, "...off-site construction, cash payment in lieu of constructing or creating the required SFHP units or manufactured home lots or dedication of land suitable for construction or creation of inclusionary units of equivalent or greater value than would be required for onsite construction." [(SFCC 26-1.33(A))]

The alternate means of compliance may be considered if the proposal demonstrates that the project meets the definition of "extreme hardship" which the ordinance defines as: "a condition occurring as a direct consequence of the SFHP Ordinance which: (a) deprives a property owner of all economically viable use of the subject property taken as a whole; or (b) would require the property owner to lose money on the development taken as a whole and the property owner can demonstrate to the governing body's satisfaction that said loss would be an unavoidable consequence of the SFHP requirement for construction of SFHP units; or (c) the property owner can demonstrate to the council's satisfaction that complying with the requirements of this chapter would constitute taking property in violation of the Constitution of the United States or New Mexico." (SFCC 26-1.5)

### ITEM AND ISSUE

Pulte Homes of New Mexico, Inc. proposes to build a total of 300 market rate homes on a land parcel in Las Soleras. The project is subject to the Santa Fe Homes Program (SFHP) ordinance (SFCC Chapter 26-1) which requires that 20% (60 homes) are sold at affordable sales prices to income-qualified homebuyers. Five percent (5%) of the total units (15) are to be priced affordably for homebuyers earning from 50-60% AMI; 30 units (10%) priced for homebuyers earning from 65-80% AMI; and 15 units (5%) priced for homebuyers earning from 80-100% AMI. See the attached SFHP Proposal for a breakdown of unit types and pricing.

Rather than deliver all 60 affordable homes, Pulte Homes requests to satisfy the SFHP requirement through the following:

- Donate six (6) building lots to Habitat for Humanity for construction of homes priced affordably to homebuyers earning no more than 60% AMI. The equivalent value of this donation is calculated through the following:  $\$90,000 \text{ per lot} \times 6 = \underline{\$540,000}$ .
- Donate a four (4)-acre parcel within Las Soleras that is suitable for future construction of a 60-72 unit LIHTC (Low Income Housing Tax Credit) project. The value of this parcel is estimated to be  $\$5.00 \text{ square foot} \times 174,240 \text{ (43,560} \times 4 \text{ acres)} = \underline{\$871,200}$ .

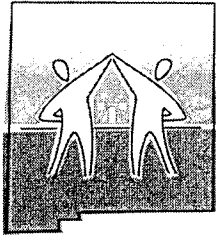
Appendix D of the SFHP Administrative Procedures provides a calculation for estimating a fee-in-lieu that is based on MLS sales data relative to the specific area of Santa Fe. Projects that are proposed in neighborhoods with higher land values pay a higher fee-in-lieu per unit than in more affordable areas of town. For the southwest sector of Santa Fe, this fee is estimated to be approx. \$42,780 per unit for a total fee of:  $42,780 \times 60 = \underline{\$2,566,800}$ . (Note: this fee is currently estimated based on 2014 income and real estate sales data and would be adjusted to present day values before being assessed.)

The difference between the fee-in-lieu for 60 units (\$2,566,800) and the estimated value of the donated land (\$1,411,200) is proposed to be compensated by the future subsidy leveraged through a LIHTC development on the donated parcel. This is a reasonable leverage assumption.

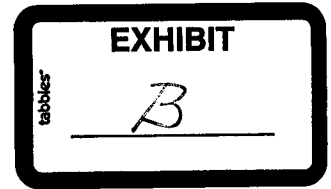
Staff recommends that the CDC consider the proposal for alternate compliance on the basis that the applicant has stated a general case for the extreme hardship that will be unavoidable if the affordable homes are built. If CDC recommends that the alternate compliance be granted, staff recommends that the CDC also considers conditions for acceptance of the alternate compliance (eg. donated lots are ready-to-build and all land use entitlements for the proposed uses are secured, etc.) to be forwarded to the Governing Body for consideration.

### Attachments:

1. SFHP Proposal
2. Cover Memo from James W. Siebert
3. Proposal for Alternate Compliance



## New Mexico Coalition to End Homelessness



July 22, 2015

Alexandra Ladd  
Housing Special Projects Manager  
City of Santa Fe  
PO Box 909  
Santa Fe, NM 87504

Dear Alexandra:

I am writing in support of the idea of allowing the Pulte at Las Soleras project to meet their affordable housing obligations with rental housing. As you know there, is a severe shortage of affordable rental housing in Santa Fe, and an even greater shortage of rental housing that is affordable to those households with the lowest incomes.

Pulte at Las Soleras is proposing to donate land to the City to be developed by the Housing Trust into 64 units of affordable rental housing, with one fourth of the units reserved for families and individuals who have been homeless. The Housing Trust has an excellent track record with two beautiful apartment developments in Santa Fe, Stage Coach and Village Sage. Both developments are well designed and serve a range of lower income families. These apartments are affordable to households that would not be in a position to buy a house.

The inclusion of families and individuals who have been homeless in these mixed income settings, provides these formerly homeless people with a stable home from which to rebuild their lives and to work toward their potential to be productive members of our community. We have found such settings to be very successful at helping people end their homelessness for good.

While the HOMES program originally envisioned the creation of affordable rental housing as well as affordable home ownership opportunities, it seems that few rental units have actually been developed through this mechanism. Allowing some developers of single family houses to meet their affordable housing obligation through development of rental units would help to correct this imbalance.

Sincerely,

Hank Hughes  
Executive Director