



Memorandum

TO: HONORABLE MAYOR
AND CITY COUNCIL

FROM: Jacky Morales-Ferrand

SUBJECT: SEE BELOW

DATE: November 18, 2021

Approved

Date

11/19/21

**SUBJECT: AFFORDABLE HOUSING IMPACT FEE FISCAL YEAR 2020-2021
ANNUAL AND FIVE-YEAR REPORT**

RECOMMENDATION

Accept the Fiscal Year 2020-2021 Annual and Five-Year report prepared in accordance with the Mitigation Fee Act (Government Code section 66000 et seq.) on the status of the City's Affordable Housing Impact Fee.

OUTCOME

Accepting the Fiscal Year 2020-2021 Annual and Five-Year report required information allows the City of San José to continue to use Affordable Housing Impact Fee ("AHIF") funds to fund affordable housing developments fully or partially. This report provides the City Council with information on the AHIF collected in Fiscal Year (FY) 2020-2021.

EXECUTIVE SUMMARY

The Affordable Housing Impact Fee FY 2020-2021 Annual and Five-Year report will support the City Council in ensuring that investment of financial resources made today support the availability of affordable housing into the future. Under the AHIF program, in FY 2020-2021, \$1,150,377.15 was added to the fund account. The City collected this revenue from two developments that moved forward with their construction process and paid their AHIF obligations. In the past five fiscal years, the Housing Impact Fee Resolution that the City Council adopted in 2014 has resulted in the collection of \$12,425,249.94 to fund affordable housing for extremely low-, very low-, low- and moderate-income households. Currently, the AHIF fund has \$5,200,000 encumbered for future affordable housing developments that will develop 286 extremely low-, very low-, low- and moderate-income units, and it is anticipated that additional affordable housing projects will receive commitments of AHIF funds in FY 2021-2022.

BACKGROUND

The Mitigation Fee Act

The Mitigation Fee Act requires public agencies to account for and make specific findings regarding mitigation fees collected by an agency as a condition of development approval. The Mitigation Fee Act regulates how public agencies may establish, collect, maintain, and spend impact fees imposed on developers. The Mitigation Fee Act also requires that the local or lead agency review and make available to the public an annual report that accounts for the mitigation fees held by the agency. The City is required to make available to the public an annual report within 180 days after the last day of each fiscal year¹. In accordance with this requirement, staff is presenting the following Annual Impact Fee report for the fiscal year ending June 30, 2021 providing all of the information required annually and also including the specific reporting required for the Five-Year report.

Affordable Housing Impact Fee

On November 18, 2014, the City Council adopted the Housing Impact Fee Resolution establishing the AHIF program. Under the Housing Impact Fee Resolution, Developers of new rental housing developments of three to nineteen² apartments are required to pay an impact fee per net rentable square foot. Revenue from the AHIF must be used to increase the supply of affordable housing for extremely low-, very low-, low- and moderate-income households including acquisition, financing, construction, and development of residential units and any necessary and reasonable costs for administering the AHIF fund. The Housing Impact Fee Resolution included an expenditure plan. That expenditure plan which provided a list of proposed affordable housing projects as examples of the types of rental housing developments that could be funded with Housing Impact Fee revenues. The Housing Department is planning to release a Notice of Funding Availability in winter 2021 for future developments, which will be funded with AHIF and other funds.

As required by law, the AHIF is segregated from the General Fund and accounted for in special revenue funds, which earn interest. These funds, including interest, must be held for the purpose for which the fees are collected (Section 66001).³ Through FY 2020-2021, the revenues from the AHIF were held in a reserve in an internal tracking fund within the Multi-Source Housing Fund. Starting in FY 2021-2022, the AHIF fund is a separate individual fund.

ANALYSIS

The City's AHIF program is consistent with the State's Mitigation Fee Act (Government Code Section 66000 *et seq*)⁴.

¹ California Government Code Section 66006(b)(1)

² <https://www.sanjoseca.gov/home/showpublisheddocument/69450/637491533154630000>

³ Unless otherwise specified, all references are to the California Government Code.

⁴ California Government Code Section 66006(b)(2).

Annual Report

In accordance with Government Code Section 66006(b)(1), the requirements for FY 2020-2021 Annual report are as follows:

A. A brief description of the type of fee in the account or fund.

The City adopted the AHIF to address the increased need for affordable housing connected with the development of new market rate residential rental units. A Nexus Study prepared by Keyser Marston Associates established a reasonable relationship between the need for affordable housing and new, market-rate rental residential development. New market rate residential rental development leads to a net increase in new residents, and the increase in goods and services required by these new residents leads to an increase in job creation in the City. These jobs include service and retail sector jobs (e.g., teachers, restaurant workers, pet care, maintenance workers, etc.). Workers employed in these typically lower wage jobs find it challenging to obtain market rate housing. This results in an increase in the need for new housing affordable to extremely low-, very low-, low-, and moderate-income households, which the Housing Impact Fee will be used to help provide.

Additionally, the City's General Plan includes goals and the provision of affordable moderate-income housing. This may include either moderate income rental housing, or purchase assistance programs for starter housing. City subsidies for moderate-income housing will likely be in the form of down-payment assistance loans to first-time homebuyers for the purchase of existing single-family homes, townhouses, and condominiums in San José, although grants for low to moderate-income self-sufficiency housing programs may also be funded. Such loans and grants will require the beneficiary to record an affordability restriction which will be enforceable by the City.

B. The amount of the fee.

The initial fee at its adoption was \$17 per each livable square foot of rentable space built within the residential development. Each year the AHIF per square foot increases annually by 2.4% each on July 1. The AHIF during the reporting period (FY 2020-2021) was \$18.70 per square foot. The current fee is \$19.15 per square foot. See Table A which summarizes the AHIF rate schedule.

Table A. Affordable Housing Impact Fee Rate Schedule

AHIF	Fiscal Year	AHIF per Sq. Ft
Original fee	July 1, 2016 - June 30, 2017	\$17.00
Fee from prior period	July 1, 2019 - June 30, 2020	\$18.26
Fee during reporting period	July 1, 2020 - June 30, 2021	\$18.70
Current fee	July 1, 2021 - June 30, 2022	\$19.15

C. The beginning and ending balance of the account or fund.

On July 1, 2020, the AHIF fund balance totaled: \$11,383,269

On June 30, 2021, the AHIF fund balance totaled: \$10,323,301

D. The amount of the fees collected, and the interest earned.

Table B summarizes the seven projects that made an AHIF payment in FY 2019-2020 and two projects that made their AHIF payment in FY 2020-2021.

Table B. Affordable Housing Impact Fee Rate Schedule

Fiscal Year	Project	Council District and Location	Impact Fee Paid	Interest Earned	Monitoring/ Processing Fee	Total
2019-2020	7th & Empire	CD3: 535 N 7 th Street	\$1,522,317.94	\$88,029.00	\$10,266	\$9,732,727.50
	2898 Joseph Ave	CD9: 2898 Joseph Ave	\$113,942.40			
	Hanover Diridon	CD6: 715 W. Julian Street	\$3,606,112.62			
	Sparta Student	CD3: 525 E. Santa Clara St.	\$1,177,587.40			
	Firestone	CD3: 477 S. Market Street	\$1,392,069.36			
	Holden of SJ II	CD6: 1015 S. Bascom Ave	\$736,462.32			
	Belmont Village	CD9: 5175 Union Ave	\$1,085,940.46			
2020-2021	Morningstar	CD1: 1366 S. DeAnza Blvd	\$789,869.30	\$249,978.25	\$3,042	\$1,150,377.15
	4094 Hamilton Ave	CD1: 4094 Hamilton Ave	\$107,487.60			
Current Total Balance			\$10,531,789.40	\$338,007.25	\$13,308.00	\$10,883,104.65

E. An identification of each public improvement on which fees were expended and the amount of the expenditures on each improvement, including the total percentage of the cost of the public improvement that was funded with fees.

Revenue from the AHIF is intended to be used to increase the supply of affordable housing for extremely low-, very low-, low-, and moderate-income households. Funding may be used towards acquisition, financing, construction, and development of Housing Facilities and any necessary and reasonable costs for administering the Housing Impact Fee Fund. This funding will help address demand from workers in jobs created by the increased demand for goods and services resulting from the increased City population occupying new market-rate rental housing developments.

Table C summarizes the disbursements. On June 30, 2021, the City approved the loan commitment allocating AHIF funds of \$2,200,000 for 101 South Jackson. Other projects that received funding commitments include Gallup-Mesa in the amount of \$500,000 for a Construction-Permanent Loan, Roosevelt, receiving a total commitment of \$500,000, and Blossom Hill in the amount of \$2,000,000 for a Construction-Permanent Loan.

Table C. Affordable Housing Impact Fee Disbursements

Development	Amount Disbursed/Committed	Date of Disbursement	Total Development Cost	Percentage of Development Funded	Date of City Council Commitment
101 S Jackson For-Sale Development	\$2,200,000 (Dispersed)	September 22, 2020	\$12,692,818	17%	June 30, 2020
Gallup-Mesa Apartments	\$500,000 (Committed)	N/A	\$37,768,894	1%	June 16, 2020
Roosevelt	\$500,000 (Committed)	N/A	\$65,258,643	1%	February 5, 2019
Blossom Hill Senior Apartments	\$2,000,000 (Committed)	N/A	\$17,083,885	12%	September 15, 2020

F. An identification of an approximate date by which the construction of the public improvement will commence if the local agency determines that sufficient funds have been collected to complete financing on an incomplete public improvement, as identified in paragraph (2) of subdivision (a) of Section 66001, and the public improvement remains incomplete.

Table D. Affordable Housing Impact Fee Construction Timelines

Development	Amount Disbursed	Construction Start	Estimated Construction Completion
101 S Jackson For-Sale Development	\$2,200,000	Winter 2022	Summer 2024
Gallup & Mesa Apartments	N/A	Winter 2021	Spring 2023
Roosevelt Park Apartments	N/A	Spring 2022	Summer 2024
Blossom Hill Senior Apartments	N/A	Summer 2021	Spring 2023

Table D summarizes construction timelines and both Gallup & Mesa Apartments and Blossom Hill Senior Apartments have started construction. These two developments are expected to be completed in spring 2023. Habitat for Humanity expects to begin construction on the 101 South Jackson for-sale development in the coming months and plans to complete construction in summer 2024. Roosevelt Park Apartments is working to secure financing, and if successful, will begin construction in spring 2022.

G. A description of each interfund transfer or loan made from the account or fund, including the public improvement on which the transferred or loaned fees will be expended, and, in the case of an interfund loan, the date on which the loan will be repaid, and the rate of interest that the account or fund will receive on the loan.

In FY 2020-2021, no fees were transferred, and no loans have been made from the AHIF fund.

H. The amount of refunds made pursuant to subdivision (e) of Section 66001 and any allocations pursuant to subdivision (f) of Section 66001.

In FY 2020-2021, no refunds were made from the AHIF fund.

Five-Year Report

In accordance with Government Code Section 66001(d) the Five-Year report⁵ requires the inclusion of the following additional findings by the Council with respect to that portion of the account or fund remaining unexpended (whether committed or uncommitted):

- 1) Identify the purpose to which the fee is to be put;
- 2) Demonstrate a reasonable relationship between the fee and the purpose for which it is charged;
- 3) Identify all sources and amounts of funding anticipated to complete financing in incomplete improvements identified in paragraph (2) of subdivision (a); and

⁵ California Government Code Section 66001(d)(1)

- 4) Designate the approximate dates on which the funding referred to in subparagraph (C) is expected to be deposited into the appropriate account or fund.

1) Identify the purpose to which the fee is to be put.

The purpose of the fee is to address the demand for affordable housing generated by increased spending for goods and services associated with new residential rental housing in the City. The purpose of the fee is also to implement the goals and objectives of the City's General Plan including those listed in Attachment C and the underlying State housing policies by facilitating the following: the development of housing affordable to a broad range of households with varying incomes within the City; making at least 15% of new housing affordable; providing safe, affordable housing for workers in resident serving industries; and reducing the potential impacts on the environment by enabling the provision of such affordable housing in the City.

The Housing Impact Fee has been used and will continue to be used, consistent with the City's expenditure plan, as amended from time to time, to increase the supply of affordable housing in the City, including acquisition, construction, and development of affordable housing, acquisition and development of Housing Facilities, and any necessary and reasonable costs for administering the Housing Impact Fee Fund. Housing Facilities include (a) property acquired or proposed for acquisition by the City for affordable housing purposes and any improvements constructed thereon and (b) recorded affordability restrictions made for the benefit of and enforceable by the City.

2) Demonstrate a reasonable relationship between the fee and the purpose for which it is charged.

The 2014 Nexus Study available at [AHIF 2014 Resolution](#) and the Expenditure Plan, as amended establish a reasonable relationship between: (a) the use of the Housing Impact Fee to create affordable housing to mitigate the increased demand for new affordable housing; and (b) new market rate residential rental developments. There is a reasonable relationship because new market rate residential rental development leads to new residents and the spending by these new residents leads to an increase in jobs. An increase in jobs will lead to demand for new housing, including new affordable housing for extremely low-, very low-, low-, and moderate-income households, which the Housing Impact Fee is intended to help provide by funding the construction of affordable housing and the acquisition of affordability covenants.

The Nexus Study also established a reasonable relationship between the need for affordable housing units and new market rate rental residential development. New market rate residential rental development leads to a net increase in new residents, and the increase in goods and services required by these new residents leads to an increase in job creation in the City. These jobs include service and retail sector jobs (e.g., teachers, restaurant workers, pet care, maintenance workers, etc.). Workers employed in these typically lower wage jobs find it challenging to obtain market rate housing. This results in an increase in the need for new housing affordable to extremely low-, very low-, low-, and moderate-income households, which the Housing Impact Fee will be used to help provide.

- 3) Identify all sources and amounts of funding anticipated to complete financing in incomplete improvements identified in paragraph (2) of subdivision (a).

101 S Jackson For-Sale Development	
Sources of Funds	Amounts
Construction Loan	\$5,591,587
HFHEBSV (Habitat for Humanity Internal Capital)	\$1,121,231
City of San Jose (AHIF)	\$2,200,000
Santa Clara County	\$2,400,000
AHP/WISH Funds	\$180,000
CA HCD	\$1,200,000
Total	\$12,692,818

Gallup & Mesa Apartments	
Sources of Funds	Amounts
Construction Loan	\$16,095,401
City of San Jose (Includes AHIF)	\$6,495,014
Santa Clara County	\$7,000,000
Accrued Deferred Interest	\$229,111
Costs Deferred Until Conversion	\$2,168,183
GP Capital	\$100
Limited Partners	\$1,753,508
Total	\$33,741,317

Roosevelt Park Apartments	
Sources of Funds	Amounts
Conventional Loan	\$6,748,000
City of San Jose (Includes AHIF)	\$11,295,000
Santa Clara County	\$10,400,000
Accrued Deferred Interest	\$539,938
FHLB SF-AHP FUNDS	\$1,000,000
AHSC	\$8,623,532
CA HCD	\$42,170,000
GP Capital	\$100
Total	\$80,776,570

Blossom Hill Senior Apartments	
Sources of Funds	Amounts
Tax Exempt- A Tranche	\$3,875,000
Tax Exempt- B Tranche	\$5,725,000
City of San Jose (Includes AHIF)	\$18,375,000
Santa Clara County	10,100,000

Accrued Deferred Interest	\$217,711
Deferred Developer Fee	\$5,585,639
General Partner	\$100
Limited Partner	\$35,798,456
Total	\$79,676,906

4) Designate the approximate dates on which the funding referred to in subparagraph (C) is expected to be deposited into the appropriate account or fund.

Development	Amount Disbursed/Committed	Date of Disbursement	Total Development Cost	Percentage of Development Funded	Date of City Council Commitment
101 S Jackson For-Sale Development	\$2,200,000 <i>(Dispersed)</i>	September 22, 2020	\$12,692,818	17%	June 30, 2020
Gallup-Mesa Apartments	\$500,000 <i>(Committed)</i>	N/A	\$37,768,894	2%	June 16, 2020
Roosevelt	\$500,000 <i>(Committed)</i>	N/A	\$65,258,643	1%	February 5, 2019
Blossom Hill Senior Apartments	\$2,000,000 <i>(Committed)</i>	N/A	\$17,083,885	11%	September 15, 2020

City subsidies for extremely low-, very low-, low-, and moderate-income housing are intended to be in the form of loans to developers of affordable rental housing developments or acquisition and leaseback of sites for affordable rental housing developments. The subsidy amounts referenced in the Residential Nexus Analysis⁶ are associated with the income of households that will reside in these subsidized developments. Additionally, the City provided acquisition financing to a developer to build townhomes affordable to low- and moderate-income homebuyers.

The following list of proposed affordable housing projects in Table E presents examples of the types of rental and for-sale housing developments that are approved to receive funding with AHIF revenues:

- **101 South Jackson Development** is a For-Sale affordable housing development that will consist of 14 attached single-family homes and will be developed by Habitat for Humanity East Bay/Silicon Valley. The townhomes will be two to four bedrooms for sale

⁶ <https://www.sanjoseca.gov/home/showpublisheddocument/75189/637608215004070000>

to low-income and moderate-income residents. Construction is expected to begin in Winter 2022 and to be completed in Summer 2024. The Housing Department has committed and spent \$2,200,000 from the City’s AHIF fund towards the development. The development is currently seeking construction funding.

- **Gallup & Mesa** is a 46-unit affordable housing development that will offer rent- and income-restricted apartments for extremely low-income, very low-income and low-income households. Construction started in Spring 2021 and will be ready for initial lease up in Spring 2023. The Housing Department has committed \$500,000 from the City’s AHIF fund towards the development.
- **Roosevelt Park Apartments** consists of 79 units for extremely low-income, very low-income, low-income, and moderate-income households, and one unrestricted manager’s unit. Construction is expected to start in Spring 2022, and it is anticipated that it will be completed by Spring 2024. The Housing Department has committed \$500,000 from the City’s AHIF fund towards the development. The development is currently seeking tax credits and/or other construction funding
- **Blossom Hill Senior Apartments** consists of 147 rent-and income-restricted apartments for extremely low-income and very low-income senior households and two unrestricted manager’s unit. Construction started Summer 2021, and it is anticipated it will be completed by Spring 2023. The Housing Department has committed \$2,000,000 from the City’s AHIF fund towards the development.

Table E. Affordable Housing Impact Fee Funding Allocations

Proposed Project	Developer	Encumbered AHIF Funding	ELI (30% AMI)	VLI (50% AMI)	LI (80% AMI)	MOD (120% AMI)	Manager Unit	Total
101 S Jackson For-Sale Development	Habitat for Humanity East Bay/Silicon Valley, Inc.	\$2,200,000			12	2		14
Gallup-Mesa Apartments	Eden Housing Inc.	\$500,000	16	23	6		1	46
Roosevelt Park Apartments	First Community Housing	\$500,000	40	20	19			79
Blossom Hill Senior Apartments	Charities Housing	\$2,000,000	48	97			2	147
TOTAL		\$5,200,000	104	140	37	2	3	286

Five-year AHIF account summary

Attachment B addresses the payments and expenditures for the Five-Year report.

CONCLUSION

The recommendations set forth within this memorandum are to accept the Annual and Five-year AHIF reports. This would complete the Mitigation Fee Act reporting requirement process.

EVALUATION AND FOLLOW-UP

This item will be reported annually to the City Council. The next report (FY 2021-2022) will be presented to City Council in fall 2022.

CLIMATE SMART SAN JOSE

The recommendation in this memo has no effect on Climate Smart San José energy, water, or mobility goals.

PUBLIC OUTREACH

Government Code Section 66006 includes a minimum 15-day requirement to make the information in the report available to the public before a public meeting is held. This report, and a copy of the Nexus Study will be made available to the public at the following location: Housing Department lobby, 200 E. Santa Clara 12th floor during business hours from November 22, 2021 until December 7, 2021. The report will be posted on the City of San José website prior to the City Council meeting scheduled for December 7, 2021.

COORDINATION

This report has been coordinated with the City Attorney's Office and the City Manager's Budget Office.

COMMISSION RECOMMENDATION/INPUT

No commission recommendation or input is associated with this action.

FISCAL/POLICY ALIGNMENT

As part of cost recovery and the City's AHIF program, application processing fees, monitoring fees and additional staff time charges were used to administer the program. The AHIF funds

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allocated for staffing was \$277,000 and \$253,000 was received from applications and monitoring fees over the 5-year period.

Acceptance of the Annual and Five-Year reports of required information will allow the City of San José to comply with State law and continue the use of AHIF funds to partially or wholly fund affordable housing projects.

The AHIF Program implements several City policy objectives that are articulated in the Envision San José 2040 General Plan. See **Attachment C** for a list of those General Plan Policies.

CEQA

Not a Project, File No. PP17-009, Staff Reports, Assessments, Annual Reports, and Informational Memos that involve no approvals of any City action.

/s/

JACKY MORALES-FERRAND
Director of Housing

The primary author of this memorandum is Darius Brown, Senior Development Officer. For questions please contact Rachel VanderVeen, Deputy Director at (408) 535-8231.

Attachments:

- **Attachment A:** City's Affordable Housing Unit Breakdown
- **Attachment B:** City's Affordable Housing Impact Fee Account Summary
- **Attachment C:** General Plan Policies

Attachment A
City's Affordable Housing Unit Breakdown

The following list of developments are approved to receive from the AHIF Fund:

Development	Developer	Progress	Expected date of Completion	120 % AMI	80% AMI	60% AMI	50% AMI	40% AMI	30 % AMI	Below 30% AMI	Total Affordable Units
Roosevelt Park Apartments	First Community Housing	In progress	Summer 2024	0	10	9	20	0	40	0	40
Gallup-Mesa Apartments	Eden Housing Inc.	In Progress	Spring 2023	0	4	2	12	11	1	15	45
101 S Jackson Development	Habitat for Humanity East Bay/Silicon Valley, Inc.	In progress	Summer 2024	2	12	0	0	0	0	0	14
Blossom Hill Senior Apartments	Charities Housing	In Progress	Spring 2023	0	0	0	49	48	48	0	145
TOTAL				2	26	11	81	59	89	15	283

* This table does not include the 3 manager units.

Other anticipated funding not AHIF \$ (amount proforma)
List of sources and amounts

Attachment B

City's Affordable Housing Impact Fee Account Summary

Payments received

AHIF Account	FY17	FY18	FY19	FY20	FY21	Total
AHIF Pipeline Annual Fee	N/A	\$59,160	\$17,000	\$10,266	N/A	\$86,426
AHIF Pipeline Application Fee	N/A	\$144,000	\$16,000	N/A	N/A	\$160,000
Affordable Housing Compliance Fee	\$3,200	N/A	N/A	N/A	\$3,042	\$6,242
AHIF	N/A	\$229,586	\$1,410,406	\$9,634,432	\$897,356	\$12,171,780
AHIF Admin Fee	N/A	N/A	\$800	N/A	N/A	\$800
Total	\$3,200	\$432,746	\$1,444,206	\$9,644,698	\$900,398	\$12,425,248

Interest and Expenditures

	FY17	FY18	FY19	FY20	FY21
Beginning Balance	N/A	\$3,200	\$438,206	\$1,822,972	\$11,383,269
Revenue	\$3,200	\$432,746	\$1,444,206	\$9,644,698	\$900,399
Interest Earned	N/A	\$2,260	\$34,844	\$88,029	\$249,978
Total Source	\$3,200	\$435,006	\$1,479,050	\$9,732,727	\$1,150,377
Expenditures	N/A	N/A	(\$94,284)	(\$172,430)	(\$2,210,345)
Ending Balance	\$3,200	\$438,206	\$1,822,972	\$11,383,269	\$10,323,301

Attachment C General Plan Policies

- H-1.2 Facilitate the provision of housing sites and structures across locations, types, price, and status as rental or ownership that responds to the needs of all economic and demographic segments of the community, including seniors, families, the homeless, and individuals with special needs.
- H-1.6 Foster the production of housing to serve the “starter” housing market by leveraging financial resources such as purchasing assistance programs, and by encouraging market-rate building typologies that service the “starter” housing market.
- H-1.9 Facilitate the development of housing to meet San José’s fair share of the County’s and region’s housing needs.
- H-1.10 Facilitate housing that is affordable to those employed in population-serving, business-support, and driving industries.
- H-2.0 Preserve and improve San José’s existing affordable housing stock and increase its supply such that fifteen percent (15%) of all new housing stock developed is affordable to low, very low, and extremely low-income households.
- H-2.1 Facilitate the production of extremely low-, very low-, low-and moderate-income housing by maximizing use of appropriate policies and financial resources at the federal, state, and local levels, and various other programs.
- H-2.8 Coordinate and implement housing policies and goals contained in the City’s Consolidated Plan, and its 5-Year Investment Plan.
- H-2.11 Seek permanent sources of affordable housing funds.
- H-3.3 Situate housing in an environment that promotes the health, safety, and well-being of the occupants, and is close to services and amenities.
- H-4.2 Minimize housing’s contribution to greenhouse gas emissions and locate housing consistent with our City’s land use and transportation goals and policies to reduce vehicle miles traveled and auto dependency.