

AFFORDABLE HOUSING

AN ASSESSMENT OF REGIONAL INDICATORS

Unfortunately, new data by which a comparison can be made to the regional indicators will not be available prior to the January 2001 submittal deadline for the Council's EAR report. The decennial census is the regional plan's primary data source for information related to household income and affordability. That data which is available suggests the region enjoyed rates of housing affordability for lower-income households in 1995 similar to those of 1989, the most recent year for which census data is available.

REGIONAL GOALS AND POLICIES

One significant data source which has been published since adoption of the regional plan is the Affordable Housing Needs Assessment Methodology (AHNAM), published by the Shimberg Center for Affordable Housing at the University of Florida. The AHNAM data updates 1990 Census data by using 1995 population and dwelling unit estimates and projections through the year 2010 prepared by the Bureau of Economic and Business Research at the University of Florida. Given that the AHNAM 1995 estimated data is one year prior to adoption of the regional plan, an evaluation of the success of the plan cannot be made with the AHNAM data. Nevertheless, the AHNAM data was unavailable at the time of adoption of the regional plan. This reason, if no other, warrants a comparison between the regional plan's regional indicators and the AHNAM data.

In sum, the AHNAM data reports essentially the same affordability rates as currently included in the regional indicators and in Tables 1.10 and 1.11 in the regional plan. Furthermore, the AHNAM data projects roughly the same rates going forward. Finally, similar to regional plan Tables 1.10 and 1.11, the AHNAM data shows that the region is in relatively well off with regards to affordable housing when compared to the statewide average. This is particularly notable for homeowners earning less than \$10,000 per year, where 51.9 percent of the region's homeowners spent 30 percent or more on home expenses in 1990, compared to 63.3 percent statewide. For renters earning less than \$10,000 per year, the AHNAM data reveals that the region reflected the statewide average. For households with annual incomes between \$10,000 and \$19,999, the region was substantially better off than the state as a whole. For renters in this income range, 33.2 percent of north central Florida renter households spent 30 percent or more on rent in 1990, compared to 40.1 percent statewide. For the region's homeowners, 51.5 percent spent 30 percent or more on housing costs compared to 70.3 percent statewide

REGIONAL GOAL 1.1. REDUCE THE PERCENTAGE OF THE REGION'S VERY LOW-, LOW-, AND MODERATE-INCOME HOUSEHOLDS SPENDING 30.0 PERCENT OR MORE OF THEIR ANNUAL HOUSEHOLD INCOME ON HOUSING.

Regional Indicator 1.1 states that 62.3 percent of the region's 1990 households with 1989 annual incomes of less than \$20,000 per year spent 30.0 percent or more of their 1989 annual income on housing.¹ The AHNAM data places the number at 56.6 percent for 1990, 56.4 percent for 1995, which was one year prior to adoption of the regional plan, and 55.4 percent for 2010.

Regional Indicator 1.2 notes that 87.6 percent of the region's 1990 renter households with 1989 annual incomes of less than \$10,000 per year spent 30.0 percent or more of their 1989 annual income on gross rent. The AHNAM data places the figure at 87.5 percent for 1990, 87.4 percent for 1995, and 87.5 percent for 2010.

Regional Indicator 1.3 notes that 54.6 percent of the region's 1990 renter households with 1989 annual incomes between \$10,000 and \$19,999 per year spent 30.0 percent or more of their 1989 annual income on gross rent. The AHNAM data places the percentage as 51.5 percent for 1990, estimates 51.6 percent for 1995, and projects 51.5 percent for 2010.

Regional Indicator 1.4 notes that 53.4 percent of the region's 1990 homeowner households with 1989 annual incomes of less than \$10,000 per year spent 30.0 percent or more of their 1989 annual income on gross rent. The AHNAM data places the percentage as 51.9 percent for 1990, estimates 52.0 percent for 1995, and projects 51.4 percent for 2010.

Regional Indicator 1.5 notes that 32.9 percent of the region's 1990 homeowner households with 1989 annual incomes between \$10,000 and \$19,999 per year spent 30.0 percent or more of their 1989 annual income on gross rent. The AHNAM data places the percentage as 32.0 percent for 1990, estimates 31.5 percent for 1995, and projects 31.3 percent for 2010.

As can be seen in the following tables, Alachua County has the region's highest rates of lower income households paying 30 percent or more of their annual incomes on housing costs. However, in the case of renter households earning between \$10,000 and \$19,999 per year, Alachua County's rate of 59.6 percent is lower than the state average of 70.3 percent. Rates for Alachua County homeowners in this income category were similar to the statewide average at 42.7 and 40.1 percent, respectively. Alachua county homeowners earning less than \$10,000 had below-average rates of households paying 30 percent or more per year on housing costs when compared to the state average. Alachua County has a higher than average rate of renters paying 30 percent or more of their annual incomes towards housing costs.

¹Some discrepancies exist between 1990 Census data and the 1990 AHNAM data due to differing methodologies used by the Bureau of the Census and the Shimberg Center.

TABLE I-1

**PERCENTAGE OF HOUSEHOLDS PAYING 30 PERCENT OR MORE OF ANNUAL INCOME ON HOUSING:
HOUSEHOLDS EARNING LESS THAN \$10,000 PER YEAR**

Area	Year									
	Owner					Renter				
	1990	1995	2000	2005	2010	1990	1995	2000	2005	2010
Alachua	58.2	58.6	58.7	58.7	58.8	90.2	90.0	90.0	90.0	90.1
Bradford	50.3	50.6	50.9	51.4	51.9	85.8	87.6	88.4	89.1	89.4
Columbia	55.1	55.1	55.1	55.2	55.2	86.3	86.9	87.2	87.6	87.8
Dixie	51.4	50.3	49.6	49.4	49.1	84.2	83.6	82.6	82.2	81.8
Gilchrist	55.8	66.5	56.3	56.5	56.5	88.0	87.2	87.1	86.9	86.6
Hamilton	41.3	41.0	40.3	40.1	39.7	84.4	84.7	84.5	84.4	84.2
Lafayette	74.2	74.6	75.4	75.5	76.0	55.0	50.0	46.7	46.2	44.4
Madison	44.4	44.0	43.8	43.5	43.4	71.1	71.1	71.1	70.8	70.7
Suwannee	41.9	41.4	40.9	40.5	40.1	76.3	76.2	75.8	75.6	75.2
Taylor	40.8	40.6	39.7	39.1	38.4	76.6	76.5	76.3	76.2	76.1
Union	41.8	41.1	41.4	42.0	42.0	79.8	80.9	81.7	83.0	83.8
Region	51.9	52.0	51.5	51.5	51.4	87.5	87.4	87.4	87.5	87.5
w/o Al Co	48.9	49.1	48.5	48.5	48.4	80.6	80.8	80.8	80.9	80.9
Florida	63.3	63.1	63.0	63.0	63.0	86.9	79.9	87.1	87.2	87.3

Source: Affordable Housing Needs Assessment Methodology, Shimberg Center for Affordable Housing, 1998.

TABLE I-2

**PERCENTAGE OF HOUSEHOLDS PAYING 30 PERCENT OR MORE OF ANNUAL INCOME ON HOUSING:
HOUSEHOLDS EARNING BETWEEN \$10,000 AND \$19,999 PER YEAR**

Area	Year									
	Owner					Renter				
	1990	1995	2000	2005	2010	1990	1995	2000	2005	2010
Alachua	42.7	42.6	42.7	42.8	42.9	59.6	59.5	59.5	59.5	59.6
Bradford	28.0	27.5	27.2	27.0	26.8	51.9	52.3	52.2	52.7	52.9
Columbia	30.8	31.2	31.4	31.6	31.8	40.3	40.2	39.9	39.8	39.6
Dixie	23.4	23.6	23.8	23.8	23.8	31.8	30.7	29.6	28.1	27.5
Gilchrist	9.7	9.2	8.8	8.6	8.5	10.7	10.6	9.1	8.0	7.8
Hamilton	5.7	5.2	4.9	4.6	4.4	29.2	29.2	29.4	29.7	30.5
Lafayette	24.5	24.6	24.8	24.7	24.8	20.0	19.0	18.4	18.6	18.5
Madison	23.0	22.0	21.7	21.5	21.5	35.6	35.8	35.7	35.9	36.1
Suwannee	28.8	29.2	29.5	29.8	30.0	24.9	24.9	25.6	25.9	26.3
Taylor	20.2	19.6	19.1	18.7	18.3	23.7	23.9	24.2	24.9	25.6
Union	49.5	50.7	51.4	52.8	53.5	14.7	13.9	14.0	13.7	13.7
Region	32.0	31.5	31.3	31.3	31.3	51.5	51.6	51.4	51.4	51.5
w/o Al Co	25.5	25.4	25.3	25.4	25.5	33.2	33.4	33.2	33.0	32.9
Florida	40.1	39.9	40.0	40.0	40.1	70.3	70.4	70.5	70.6	70.8

Source: Affordable Housing Needs Assessment Methodology, Shimberg Center for Affordable Housing, 1998.

TABLE I-3

**PERCENTAGE OF HOUSEHOLDS PAYING 30 PERCENT OR MORE OF ANNUAL INCOME ON HOUSING:
HOUSEHOLDS EARNING BETWEEN \$20,000 AND \$34,999 PER YEAR**

Area	Year									
	Owner					Renter				
	1990	1995	2000	2005	2010	1990	1995	2000	2005	2010
Alachua	19.9	19.7	19.8	19.8	19.8	15.6	13.4	13.5	13.5	13.5
Bradford	11.6	11.2	11.2	11.0	10.9	4.6	4.4	4.4	4.4	4.3
Columbia	8.4	8.0	7.9	7.7	7.6	4.6	4.6	4.9	4.5	4.5
Dixie	4.8	4.9	4.8	4.7	4.7	0.0	0.0	0.0	0.0	0.0
Gilchrist	6.4	6.7	6.8	6.9	7.0	0.0	0.0	0.0	0.0	0.0
Hamilton	2.4	2.3	2.2	2.2	2.3	0.0	0.0	0.0	0.0	0.0
Lafayette	1.2	1.0	0.8	0.8	0.8	0.0	0.0	0.0	0.0	0.0
Madison	5.6	5.7	5.7	5.9	5.9	0.0	0.0	0.0	0.0	0.0
Suwannee	7.8	8.1	8.3	8.4	8.5	3.0	2.5	2.3	2.2	1.9
Taylor	6.9	6.8	6.6	6.6	6.5	0.0	0.0	0.0	0.0	0.0
Union	5.8	5.9	5.9	5.8	5.6	0.0	0.0	0.0	0.0	0.0
Region	12.7	12.3	12.1	12.1	12.0	10.9	9.8	9.8	9.7	9.7
w/o Al Co	7.3	7.1	7.0	7.0	6.9	2.5	2.5	2.4	2.3	2.3
Florida	26.6	26.5	26.6	26.7	26.7	21.9	22.0	22.1	22.2	22.4

Source: Affordable Housing Needs Assessment Methodology, Shimberg Center for Affordable Housing, 1998.

TABLE I-4

**PERCENTAGE OF HOUSEHOLDS PAYING 30 PERCENT OR MORE OF ANNUAL INCOME ON HOUSING:
HOUSEHOLDS EARNING BETWEEN \$35,000 AND \$49,999 PER YEAR**

Area	Year									
	Owner					Renter				
	1990	1995	2000	2005	2010	1990	1995	2000	2005	2010
Alachua	6.6	6.5	6.5	6.6	6.6	2.8	2.9	2.8	2.8	2.8
Bradford	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Columbia	3.7	3.8	3.9	3.9	4.0	0.0	0.0	0.0	0.0	0.0
Dixie	5.7	6.2	6.3	6.5	6.6	0.0	0.0	0.0	0.0	0.0
Gilchrist	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Hamilton	10.5	10.6	11.2	11.5	11.6	0.0	0.0	0.0	0.0	0.0
Lafayette	15.1	15.2	15.1	15.1	15.0	0.0	0.0	0.0	0.0	0.0
Madison	4.9	5.2	5.3	5.4	5.4	0.0	0.0	0.0	0.0	0.0
Suwannee	2.7	2.7	2.8	2.8	2.9	0.0	0.0	0.0	0.0	0.0
Taylor	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Union	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Region	4.8	4.8	4.9	5.0	5.0	1.9	1.9	1.9	1.8	1.9
w/o Al Co	3.0	3.2	3.5	3.6	3.6	0.0	0.0	0.0	0.0	0.0
Florida	12.2	12.2	12.2	12.2	12.3	4.7	4.7	4.7	4.7	4.7

Source: Affordable Housing Needs Assessment Methodology, Shimberg Center for Affordable Housing, 1998.

TABLE I-5

PERCENTAGE OF HOUSEHOLDS PAYING 30 PERCENT OR MORE OF ANNUAL INCOME ON HOUSING HOUSEHOLDS EARNING \$50,000 AND OVER PER YEAR

Area	Year									
	Owner					Renter				
	1990	1995	2000	2005	2010	1990	1995	2000	2005	2010
Alachua	1.7	1.7	1.7	1.7	1.8	0.0	0.0	0.0	0.0	0.0
Bradford	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Columbia	0.6	0.5	0.4	0.4	0.4	0.0	0.0	0.0	0.0	0.0
Dixie	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Gilchrist	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Hamilton	0.7	0.5	0.4	0.5	0.5	0.0	0.0	0.0	0.0	0.0
Lafayette	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Madison	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Suwannee	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Taylor	3.9	3.8	3.9	3.9	3.9	0.0	0.0	0.0	0.0	0.0
Union	2.7	2.5	2.9	2.7	3.0	0.0	0.0	0.0	0.0	0.0
Region	1.4	1.3	1.3	1.3	1.3	0.0	0.0	0.0	0.0	0.0
w/o Al Co	0.8	0.7	0.7	0.7	0.7	0.0	0.0	0.0	0.0	0.0
Florida	5.8	5.8	5.8	5.8	5.8	1.2	1.2	1.2	1.2	1.2

Source: Affordable Housing Needs Assessment Methodology, Shimberg Center for Affordable Housing, 1998.

IMPACT ON LOCAL GOVERNMENT COMPREHENSIVE PLANS

Local governments in all ten rural north central Florida counties primarily rely on the private market for the provision of affordable housing units. This is accomplished chiefly by local government comprehensive plan policies which call for, and Future Land Use Map classifications which establish, higher densities of residential development within urban areas and the allowance of mobile homes within specified land use classifications.

Within the region's most populous county, both Alachua County and the City of Gainesville comprehensive plans contain policy direction consistent with regional plan Policy 1.1.2 which calls for the provision of incentives, such as density bonuses to private builders who construct 10.0 percent or more of their units which are affordable to either very low-, low-, or moderate-income households. The Housing Element of the Alachua County Comprehensive Plan contains policy direction calling for the creation of incentives in the land development regulations to promote the construction of dwelling units affordable to either low- or very low-income households (Housing Element Policy 1.1.9). The City of Gainesville Housing Element contains policy direction promoting the use of zero lot lines and cluster subdivisions as incentives for the construction of low income housing (Housing Element Policy 1.2.4). The city recently approved a draft amendment to its comprehensive plan calling for the city to work with the county in developing land development regulations which promote the creation of a county-wide "fair share" housing ordinance for the dispersal of affordable housing units throughout their jurisdictions. The impact of the city's proposed policy is unknown at this time.

Local comprehensive plan policies encouraging the construction of affordable housing is particularly important in urban areas as north central Florida urban areas, in contrast to its rural areas, at least as suggested by the data contained in the Affordable Housing Element of the regional plan, are experiencing the greater difficulty in providing an adequate supply of affordable housing for their residents. In rural areas, affordable housing demand is typically met by the placement of mobile homes on individual lots. The Council should stress the need for the inclusion of local government comprehensive plan policies which encourage the construction of affordable housing units within urban areas during Council review of local government comprehensive plan evaluation and appraisal reports and proposed amendments to local government housing elements.

Regional Policy 1.1.1 calls for the provision of affordable housing units. However, the policy does not indicate a means by which housing is to be provided. It is recommended that this policy be revised to use local governments and local government comprehensive plans as the means through which the policy will be implemented. One possible rewording of the policy is presented below:

Policy 1.1.1. ~~Provide affordable housing and multi-family dwelling units.~~ Encourage the development of policies within local government comprehensive plans which provide incentives or otherwise provide for the construction of affordable housing units in a manner which results in a dispersal of affordable housing units throughout the local government's jurisdiction.

SUCSESSES AND SHORT COMINGS

Between June, 1996, (since the adoption of the SRPP) through November, 1999, (the date as of this writing), north central Florida local governments have not requested Council assistance in the preparation of State Housing Improvement Program (SHIP) applications or SHIP Housing Assistance Plans as called for by Regional Policy 1.1.3.

Since enactment of the regional plan, the Council annually assists between 20 to 25 north central Florida local governments in either adopting or amending their comprehensive plans. It is anticipated that the Council will continue to assist local governments in the development and maintenance of their comprehensive plans. This action is in accordance with regional plan Policy 1.1.5, which calls for the Council to provide technical assistance to local governments in preparing and revising local government comprehensive plan housing elements.

Regional Policy 1.1.6 calls for the Council to develop and maintain estimates of the number of low-, very low-, and moderate-income households by county for all north central Florida communities. The Council has estimates of very low-, low-, and moderate income households which are derived from the 1993 Comprehensive Housing Affordability Study, which is based on 1990 census data. The Council does not anticipate updating its estimates of very low-, low-, and moderate-income households until several years after the Year 2000 decennial census.

The Council regularly assists north central Florida local governments in the preparation of Community Development Block Grant (CDBG) housing rehabilitation and neighborhood revitalization applications. From fiscal years 1996/97 through 1998/99, the Councils assisted north central Florida local governments in the preparation of 22 CDBG housing rehabilitation and neighborhood revitalization applications. The Council has also assisted four local governments in the administration of their CDBG housing and neighborhood revitalization grants during this time period. The Council's assistance furthers regional plan Policy 1.1.7 which calls for the Council to provide assistance to north central Florida local governments in the development of CDBG applications.

THE DEVELOPMENT OF REGIONAL IMPACT (DRI) AFFORDABLE HOUSING RULE

Although the DRI Affordable Housing Rule was adopted by the Florida Department of Community Affairs in 1994, the Council did not review a DRI for which the rule applied until 1999. The rule requires, under certain circumstances, the provision of an adequate number of housing units affordable to all very low-, low-, and moderate-income households of the employees at the DRI project site.²

²Moderate-Income Household: A household with an annual income between 80 and 120 percent of the median annual income. Low-Income Household: A household with an annual income between 50 and 80 percent of the median annual income. Very Low-Income Household: A household with an annual income below 50 percent of the median annual income.

The rule prescribes a method by which affordable housing supply and demand are to be determined. It also provides for alternative methods for determining the affordable housing demand, supply, and need if agreed to by the applicant and the Council during the DRI pre-application conference. The East Central Florida Regional Planning Council (ECFRPC) has developed an alternative methodology which is widely used throughout the state. The North Central Florida Regional Planning Council uses a modified version of their methodology.

The rule states that the determination of adequate affordable housing necessitates a dividing of the very low-, low-, and moderate-income employee classifications into subcategories. The rule calls for a matching of affordable housing supply to demand within each subcategory. The East Central Florida Affordable Housing Methodology follows the rule by dividing very low-, low-, and moderate-income classes into subcategories, typically dividing each class into five or six subcategories. However, the ECFRPC approach does not similarly divide affordable housing supply into subcategories for purposes of matching the affordable housing supply to demand as called for the adequate housing rule. Instead, the ECFRPC methodology matches demand to supply within the broader very low-, low-, and moderate income classes. The difference between the two approaches is apparent in the very low-income sufficiency/deficiency column in Table I-6, below. Using the approach stipulated by the adequate housing rule, a deficiency exists for households with incomes of less than \$10,000 per year. Under the East Central Florida approach, the sub-categories are combined so that the 10-unit deficiency is offset by the surplus in the other very low-income subcategories.³

The ECFRPC method does not assure that all households within a specified income class can afford each and every housing unit deemed affordable for the prescribed income class. It is entirely possible that most of the housing units within a specified income class are only affordable to households with incomes in the upper end of the income class while, at the same time, most of the households could have an average income in the lower portion of the specified income class. Under these circumstances, it is easy to see how the majority of lower income households could not afford housing purportedly affordable to their specified income class, and, therefore, the need to further divide each income class into subcategories.

The Council should consider amending the Affordable Housing Element to identify a DRI affordable housing methodology which divides the moderate income, low income, and very low income ranges into subcategories in order to match affordable supply to demand within these subcategories in a manner consistent with Rule 9J-2.048. F.A.C.

³While Table I-6 shows a deficiency of 17 units, the surplus 7 units from the lowest-income category are available to partially meet the 17-unit demand of the next-highest income group, thereby reducing the subcategory's deficiency to 10 units.

TABLE I-6

HYPOTHETICAL DRI: ESTIMATED PHASE 1 AFFORDABLE HOUSING DEMAND AND SUPPLY

AFFORDABLE HOUSING UNIT DEMAND				AFFORDABLE HOUSING UNIT SUPPLY ^a					SUFFICIENCY/ (DEFICIENCY)
INCOME RANGE MID-POINT	NUMBER OF UNITS	MAXIMUM MONTHLY RENT	MAXIMUM HOME PRICE	RENTAL OFF-SITE	FOR-SALE OFF-SITE	RENTAL ON-SITE	FOR-SALE ON-SITE	ON-SITE MITIGATION CREDIT	
\$10,000	15	\$200	\$34,502	22	0	0	0	0	7
\$13,250	17	281	45,417	0	0	0	0	0	(17)
\$15,750	1	1,344	53,952	19	5	0	0	0	23
\$18,250	1	406	62,639	17	15	0	0	0	31
\$20,070	32	452	68,888	26	15	0	0	0	9
\$20,750	2	469	71,174	6	7	0	0	0	11
\$23,250	2	531	79,708	75	39	0	0	0	112
\$25,750	4	594	88,243	11	35	0	0	0	42
\$26,600	24	615	91,291	17	12	0	0	0	1
\$28,250	9	656	96,930	0	25	0	0	0	16
\$30,350	5	709	104,093	14	27	0	0	0	36
\$31,625	3	741	108,513	26	10	0	16	8	57
\$32,450	1	761	111,257	0	13	0	16	8	36
\$34,950	0	824	119,791	15	15	0	36	18	84
\$36,650	1	866	125,735	10	15	0	37	19	80
\$37,600	0	890	128,935	3	3	0	20	10	36
\$41,650	3	991	142,805	11	22	0	20	10	60
\$46,675	7	1,117	160,026	9	0	0	0	0	2

^aIncludes on-site mitigation credit as provided in Rule 9J-2.048, F.A.C.

Source: North Central Florida Regional Planning Council, January 2000.

UNANTICIPATED PROBLEMS AND OPPORTUNITIES

Typographical and other minor errors may exist in the text and tables of the Affordable Housing Element. One such error includes the Glossary's definition of Moderate Income households. The definition incorrectly defines the term as a household with an annual income between 80 and 95 percent of the median annual income. The correct definition is a household with an annual income between 80 and 120 percent of the median annual income.

IMPACT OF CHANGES IN STATE STATUTES AND RULES AS WELL AS THE STATE COMPREHENSIVE PLAN

No significant changes have occurred which affect the Affordable Housing Element since the adoption of the regional plan.

NEED FOR PLAN AMENDMENTS AND NEW ACTIONS TO ADDRESS PLANNING ISSUES IDENTIFIED IN THE EAR

Various recommendations have been included in earlier sections of this review regarding possible changes to the plan's Affordable Housing Element. This section recaps the recommended amendments.

1. The Council should consider amending the Affordable Housing Element to identify a DRI affordable housing methodology which divides the moderate income, low income, and very low income ranges into subcategories in order to match affordable supply to demand within these subcategories in a manner consistent with Rule 9J-2.048. F.A.C.
2. Correct typographical and other minor errors may exist in the text and tables of the Affordable Housing Element. One such error includes the Glossary's definition of Moderate Income households. The definition incorrectly defines the term as a household with an annual income between 80 and 95 percent of the median annual income. The correct definition is a household with an annual income between 80 and 120 percent of the median annual income.
3. The Council should stress the need for the inclusion of local government comprehensive plan policies which encourage the construction of affordable housing units within urban areas during Council review of local government comprehensive plan evaluation and appraisal reports and proposed amendments to local government housing elements.
4. Amend Policy 1.1.1 to rely on local governments and local government comprehensive plans as the means through which the policy will be implemented. One possible rewording of the policy is presented below:

Policy 1.1.1. ~~Provide affordable housing and multi-family dwelling units.~~ Encourage the development of policies within local government comprehensive plans which provide incentives or otherwise provide for the construction of affordable housing units in a manner which results in a dispersal of affordable housing units throughout the local government's jurisdiction.