



**MEMORANDUM
COMMUNITY DEVELOPMENT DEPARTMENT
Planning Division**

DATE: October 9, 2019
TO: Planning Commission
FROM: Greg Stones, Principal Planner
SUBJECT: Supplemental Information – Agenda Item No 1

The attached letter was received on October 3, 2019, after Planning Commission packets were distributed. Copies of the letter are being provided to the Planning Commission and made available to the public as supplement information.

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October 3, 2019

Planning Commission
City of Lompoc
100 Civic Center Drive
Lompoc, CA 93436

**RE: Cypress and 7th Affordable Housing Development
CUP 18-04**

Dear Planning Commissioners:

The Housing Authority of the County of Santa Barbara's ("Housing Authority") application for the affordable housing development proposed at 1408 E. Cypress Avenue was deemed complete on December 21, 2018, and the City has determined that the project is categorically exempt from environmental review pursuant to CEQA Section 15332 (In-fill Development Projects). The City's review of the project application has now taken over nine months and has been continued by the Planning Commission at each of the four previous hearings. The hearing on October 9, 2019 will be the fifth hearing on this item.

The Housing Authority respectfully requests that the Planning Commission take action on the project application at the upcoming hearing without further delay. The Permit Streamlining Act ("PSA") (Gov. Code §§ 65920, *et seq.*) applies to the City's decision on the project application and requires that the City complete its review and decision on the Conditional Use Permit for the project within 60 days of the determination that the project is exempt from CEQA. (*Id.* § 65950(a)(5).) This is a mandatory time limit and failure by the City to approve or disapprove the project application within the prescribed time limit may result in the project being "deemed" approved. (*Id.* § 65943; *Am. Tower Corp. v. City of San Diego*, 763 F.3d 1035, 1044 (9th Cir. 2014).) If the City continues to delay its decision on the project application beyond the October 9, 2019 hearing, the Housing Authority will initiate proceedings to have the application deemed approved by operation of the PSA. (Gov. Code § 65956.)

This letter also serves to provide additional information in response to the Planning Commission's comments, concerns, and requests for additional information at the September 25, 2019 hearing and provides general information regarding other applicable state laws the Planning Commission should take into consideration when making its decision on the requested Conditional Use Permit.



Housing Accountability Act

At each Planning Commission hearing on the project application, City staff have recommended approval of the project and advised the Planning Commission as to the applicability of the Housing Accountability Act (“HAA”) and limited findings for denial under State law. Many of the Planning Commission’s comments and concerns are aimed at conjuring evidence of a public health or safety impact in order to deny the project under Subsection (d)(2) of HAA. Despite letters of support from the City Police and Fire Departments indicating that the proposed project can and will be adequately served by these departments, the Planning Commission again continued the item at the September 25, 2019 hearing and requested additional information regarding police services.

As the State legislature declared in the HAA, California has become the most expensive in the nation, and the lack of housing is a critical problem that threatens the economic, environmental, and social quality of life in California. The legislature also finds that the excessive cost of the state’s housing supply is partially caused by activities and policies of many local governments that limit the approval of housing.

For these reasons, the legislature has enacted a variety of laws in recent years that are aimed at streamlining the approval process for affordable and supportive housing projects and reducing local agencies’ ability to deny housing projects. It is the explicit policy of the State that these laws should be interpreted and implemented by local agencies in a manner to afford the fullest possible weight to the interest of approving and providing housing. As stated in each of the Staff reports for the project, there is no evidence in the record to support denial of the project without violating the HAA.

Costs of the Affordable Housing Project to the City

The Planning Commission has cited concerns that 1) because the project will be exempt from paying taxes due to its eligibility for affordable housing grants and financing, and 2) because it will be occupied by persons of low, very-low, and extremely-low income, the project will require increased police services and result in a net cost to the City.

Pursuant to Gov. Code § 65008 (see Attachment I), any action by a city is null and void if it denies a project because of the method of financing of a housing development or the development’s intended use to provide low income housing. Because the Planning Commission’s concerns with respect to public safety impacts and costs are based on the anticipated financing and its associated tax exempt status, as well as the tenants’ income, status, and presumed increase in crime rates and police services associated with these residents, a decision to deny



the project on these grounds would be discriminatory and therefore null and void under State law.

In addition, the Housing Authority will pay development impact fees to the City prior to completion of the project. Development impact fees are established by the City's Development Impact Fee Study and reviewed and approved each fiscal year by the City Council. Pursuant to Gov. Code. § 66000, impact fees are intended to defray the costs of public facilities and services related to development projects. These fees are applicable to all development projects in the City and include fees relating to the provision of police and fire department services, traffic and street improvements, and other public services. Any presumed impacts to public services related to this project would be offset via payment of these fees.

As mentioned in the August 14, 2019 Staff Report, the property taxes the City will forego as a result of the tax-exempt status of the project are minimal – approximately \$256 annually. If the Planning Commission is considering an exaction in the form of a Payment In-Lieu of Taxes (PILOT) agreement, it should be aware that these types of agreements were banned by the State Legislature pursuant to SB 1203 & AB 1760 (effective January 1, 2015).

Lastly, the Commission's insistence on analyzing the public safety impacts due to the income status and of the anticipated future tenants, as well as the project's method of financing and associated property tax exemption, has required unreasonable delays and requests for information which are not required for other projects within the City. Other development projects have been approved in the City without the same information, scrutiny, or delays as this proposed affordable housing project. This is not the intent of the State policies relating to the approval and provision of housing, and the discriminatory practice of applying different standards and/or inconsistently applying standards for discretionary approval of affordable housing projects is again prohibited by Gov. Code § 65008.

The Project's Impact on Public Safety

Despite the above legal framework and considerations, research shows that supporting a Housing First approach for people with special needs is the most cost-effective solution and may result in reduced costs for public services. Once people are in a stable residence and have resources and services available to them, they are less likely to be involved in criminal activities which helps reduce public safety costs for the City as a whole. (See Attachment 2).

As the Housing Authority has mentioned at previous public hearings on this item, there are over 5,800 people on the affordable housing waiting list who already reside in the City. Because of



the Housing Authority's preferred leasing practices, many future tenants are anticipated to be people who currently live in Lompoc and are already utilizing the City's public safety resources. However, future tenants who currently reside in Lompoc are likely currently spread out across the City. Providing quality special needs housing for people already residing the City in a location less than one mile away from the police station will likely reduce calls for service related to these individuals and therefore reduce police response times City-wide.

Conclusion

The Housing Authority appreciates the Planning Commission's consideration of this letter and is happy to discuss in further detail at the October 9, 2019 hearing. It is imperative that the Commission no longer delay its decision, and the Housing Authority respectfully requests that the Commission approve the Conditional Use Permit and allow it to move forward with this development in its mission to provide affordable housing opportunities for low income households in an environment which preserves personal dignity and in a manner which maintains the public trust.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tony Tomasello'.

Tony Tomasello
Senior Planner
RRM Design Group

Attachments:

- 1) California Government Code §65008
- 2) Justice Policy Institute: Housing and Public Safety, 2007

cc: Bob Havlicek, Housing Authority of the County of Santa Barbara
John Polanskey, Housing Authority of the County of Santa Barbara
Mark Manion, Price, Postel & Parma, LLP

ATTACHMENT 1

**GOVERNMENT CODE - GOV**

TITLE 7. PLANNING AND LAND USE [65000 - 66499.58] (*Heading of Title 7 amended by Stats. 1974, Ch. 1536.*)

DIVISION 1. PLANNING AND ZONING [65000 - 66210] (*Heading of Division 1 added by Stats. 1974, Ch. 1536.*)

CHAPTER 1. General Provisions [65000 - 65010] (*Heading of Chapter 1 amended by Stats. 1956, 1st Ex. Sess., Ch. 33.*)

65008. (a) Any action pursuant to this title by any city, county, city and county, or other local governmental agency in this state is null and void if it denies to any individual or group of individuals the enjoyment of residence, landownership, tenancy, or any other land use in this state because of any of the following reasons:

(1) (A) The lawful occupation, age, or any characteristic of the individual or group of individuals listed in subdivision (a) or (d) of Section 12955, as those bases are defined in Sections 12926, 12926.1, subdivision (m) and paragraph (1) of subdivision (p) of Section 12955 and Section 12955.2.

(B) Notwithstanding subparagraph (A), with respect to familial status, subparagraph (A) shall not be construed to apply to housing for older persons, as defined in Section 12955.9. With respect to familial status, nothing in subparagraph (A) shall be construed to affect Sections 51.2, 51.3, 51.4, 51.10, 51.11, and 799.5 of the Civil Code, relating to housing for senior citizens. Subdivision (d) of Section 51, Section 4760, and Section 6714 of the Civil Code, and subdivisions (n), (o), and (p) of Section 12955 of this code shall apply to subparagraph (A).

(2) The method of financing of any residential development of the individual or group of individuals.

(3) The intended occupancy of any residential development by persons or families of very low, low, moderate, or middle income.

(b) (1) No city, county, city and county, or other local governmental agency shall, in the enactment or administration of ordinances pursuant to any law, including this title, prohibit or discriminate against any residential development or emergency shelter for any of the following reasons:

(A) Because of the method of financing.

(B) (i) Because of the lawful occupation, age, or any characteristic listed in subdivision (a) or (d) of Section 12955, as those characteristics are defined in Sections 12926, 12926.1, subdivision (m) and paragraph (1) of subdivision (p) of Section 12955, and Section 12955.2 of the owners or intended occupants of the residential development or emergency shelter.

(ii) Notwithstanding clause (i), with respect to familial status, clause (i) shall not be construed to apply to housing for older persons, as defined in Section 12955.9. With respect to familial status, nothing in clause (i) shall be construed to affect Sections 51.2, 51.3, 51.4, 51.10, 51.11, and 799.5 of the Civil Code, relating to housing for senior citizens. Subdivision (d) of Section 51, Section 4760, and Section 6714 of the Civil Code, and subdivisions (n), (o), and (p) of Section 12955 of this code shall apply to clause (i).

(C) Because the development or shelter is intended for occupancy by persons and families of very low, low, or moderate income, as defined in Section 50093 of the Health and Safety Code, or persons and families of middle income.

(D) Because the development consists of a multifamily residential project that is consistent with both the jurisdiction's zoning ordinance and general plan as they existed on the date the application was deemed complete, except that a project shall not be deemed to be inconsistent with the zoning designation for the site if that zoning designation is inconsistent with the general plan only because the project site has not been rezoned to conform with a more recently adopted general plan.

(2) The discrimination prohibited by this subdivision includes the denial or conditioning of a residential development or shelter because of, in whole or in part, either of the following:

(A) The method of financing.

(B) The occupancy of the development by persons protected by this subdivision, including, but not limited to, persons and families of very low, low, or moderate income.

(3) A city, county, city and county, or other local government agency may not, pursuant to subdivision (d) of Section 65589.5, disapprove a housing development project or condition approval of a housing development project in a manner that renders the project infeasible if the basis for the disapproval or conditional approval includes any of the reasons prohibited in paragraph (1) or (2).

(c) For the purposes of this section, "persons and families of middle income" means persons and families whose income does not exceed 150 percent of the median income for the county in which the persons or families reside.

(d) (1) No city, county, city and county, or other local governmental agency may impose different requirements on a residential development or emergency shelter that is subsidized, financed, insured, or otherwise assisted by the federal or state government or by a local public entity, as defined in Section 50079 of the Health and Safety Code, than those imposed on nonassisted developments, except as provided in subdivision (e). The discrimination prohibited by this subdivision includes the denial or conditioning of a residential development or emergency shelter based in whole or in part on the fact that the development is subsidized, financed, insured, or otherwise assisted as described in this paragraph.

(2) (A) No city, county, city and county, or other local governmental agency may, because of the lawful occupation age, or any characteristic of the intended occupants listed in subdivision (a) or (d) of Section 12955, as those characteristics are defined in Sections 12926, 12926.1, subdivision (m) and paragraph (1) of subdivision (p) of Section 12955, and Section 12955.2 or because the development is intended for occupancy by persons and families of very low, low, moderate, or middle income, impose different requirements on these residential developments than those imposed on developments generally, except as provided in subdivision (e).

(B) Notwithstanding subparagraph (A), with respect to familial status, subparagraph (A) shall not be construed to apply to housing for older persons, as defined in Section 12955.9. With respect to familial status, nothing in subparagraph (A) shall be construed to affect Sections 51.2, 51.3, 51.4, 51.10, 51.11, and 799.5 of the Civil Code, relating to housing for senior citizens. Subdivision (d) of Section 51, Section 4760, and Section 6714 of the Civil Code, and subdivisions (n), (o), and (p) of Section 12955 of this code shall apply to subparagraph (A).

(e) Notwithstanding subdivisions (a) to (d), inclusive, this section and this title do not prohibit either of the following:

(1) The County of Riverside from enacting and enforcing zoning to provide housing for older persons, in accordance with state or federal law, if that zoning was enacted prior to January 1, 1995.

(2) Any city, county, or city and county from extending preferential treatment to residential developments or emergency shelters assisted by the federal or state government or by a local public entity, as defined in Section 50079 of the Health and Safety Code, or other residential developments or emergency shelters intended for occupancy by persons and families of low and moderate income, as defined in Section 50093 of the Health and Safety Code, or persons and families of middle income, or agricultural employees, as defined in subdivision (b) of Section 1140.4 of the Labor Code, and their families. This preferential treatment may include, but need not be limited to, reduction or waiver of fees or changes in architectural requirements, site development and property line requirements, building setback requirements, or vehicle parking requirements that reduce development costs of these developments.

(f) "Residential development," as used in this section, means a single-family residence or a multifamily residence, including manufactured homes, as defined in Section 18007 of the Health and Safety Code.

(g) This section shall apply to chartered cities.

(h) The Legislature finds and declares that discriminatory practices that inhibit the development of housing for persons and families of very low, low, moderate, and middle incomes, or emergency shelters for the homeless, are a matter of statewide concern.

(Amended (as amended by Stats. 2012, Ch. 181, Sec. 52) by Stats. 2013, Ch. 605, Sec. 28. (SB 752) Effective January 1, 2014.)

Housing and Public Safety

November 1, 2007

The Justice Policy Institute is a Washington, D.C.-based think tank dedicated to ending society's reliance on incarceration and promoting effective and just solutions to social problems.

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Introduction

The United States leads the world in the number of people incarcerated in federal and state correctional facilities. There are currently 1.4 million people in America's prisons and more than 700,000 people in America's jails.¹ According to survey research on the correctional population, approximately 26 percent of people in jail reported that they were homeless in the year prior to their incarceration, and 19.5 percent of state prisoners reported being homeless.² The United States continues to have the highest incarceration rate in the world and, with an estimated 3 million people living without a home every year,³ continues to struggle with the policy challenges of chronic homelessness, the lack of affordable housing, and the exclusion of certain people from federal housing subsidies.

This research brief will summarize recent findings on what is known about access to quality or substandard housing as it relates to public safety and the use of incarceration. Along with conducting a brief literature review, the Justice Policy Institute (JPI) has compared data on state housing expenditures with crime rates and incarceration rates. While there is no single solution that will entirely reduce the probability that a person will be involved in criminal activity, and the literature is not conclusive on any one factor that would solve every community's various challenges, the research suggests that increased investments in housing can have a positive public safety benefit. JPI's findings include:

- **Some studies found that substandard housing—particularly where exposure to lead hazards is more likely to occur—is associated with higher rates of violent crime.** Two recent independent studies have shown that exposure to lead, associated with older, deteriorated, and lower-quality housing, can result in increased delinquency, violence, and crime.
- **For populations who are most at risk for criminal justice involvement, supportive or affordable housing has been shown to be a cost-effective public investment, lowering corrections and jail expenditures and freeing up funds for other public safety investments.** Additionally, providing affordable or supportive housing to people leaving correctional facilities is an effective means of reducing the chance of future incarceration.

¹ Sabol, William J., Todd D. Minton, and Paige M. Harrison. 2007. *Prison and jail inmates at midyear 2006*. Washington, DC: Bureau of Justice Statistics.

² James, Doris J., and Lauren E. Glaze. 2006. *Mental health problems of prison and jail inmates*. Washington, DC: Bureau of Justice Statistics.

³ Human Rights Watch. 2004. *No second chance*. New York: Human Rights Watch.

- **States that spent more on housing experienced lower incarceration rates than states that spent less.** Of the ten states that spent a larger proportion of their total expenditures on housing, all ten had incarceration rates lower than the national average. Of the ten states that spent a smaller proportion of their total expenditures on housing, five had incarceration rates above the national average and two had incarceration rates just below the national average.

What is meant by “supportive” and “affordable” housing?

Affordable housing, and its subset of *supportive housing*, refers to permanent housing that is affordable to persons making 80 percent of the median income in the area. Rents charged are typically less than 30 to 40 percent of the household income. Affordability is generally accomplished through federal, state, and local governmentally subsidized programs that provide assistance in capital and/or operating resources. Capital and operating assistance can occur in many forms, such as money invested in exchange for tax credits from federal and/or state income taxes, mortgage interest deductions, direct payments to supplement rent payments, and real property donations or property sale or lease at less than market value of land to be used for the construction of affordable housing.

Supportive housing is housing that provides on-site services to individuals in need of support to improve or maintain their health, independent living skills, income, employment, socialization skills, quality of life, and, most important, maintain their housing. People who qualify for this type of housing may include the homeless, people with mental illness, the elderly, those with substance abuse problems, and those being released from incarceration. Best practices indicate that the housing and the support services work cooperatively but are independent of each other. Services are provided as an adjunct to housing, and the use of services is usually not a requirement of the housing. Supportive housing is typically limited to people with disabilities or special needs and who have incomes at or below 30 percent of the median income in the area.

2) Affordable and supportive housing can provide public safety benefits to communities.

“Opposition to affordable housing often rests on the assumption that affordable housing brings no net benefits to the community, and that it threatens property values in the neighborhood concerned.” *Elizabeth J. Mueller and J. Rosie Tighe, University of Texas, Austin*¹¹

Neighborhood residents sometimes raise concerns that a new supportive housing project might aggravate the community’s public safety challenge. In 1997 the National Law Center on Homelessness and Poverty polled 89 supportive housing programs and found that 41 percent had experienced “not in my backyard” opposition from prospective neighbors and local governments prior to beginning their operations.¹² Sixty-one percent of these opponents listed a potential increase in crime as their major concern with having supportive housing in their community. However, studies have shown not only that the addition of supportive housing to a community does not increase crime, but also that investments in supported housing have been associated with improved neighborhood quality and property values.¹³

Research published in the *Journal of Urban Affairs* in 2002 examined 14 Denver neighborhoods in which supportive housing facilities opened between 1992 and 1995 to determine the impact of supportive housing on neighborhood crime rates. The authors concluded that none of the categories of reported crime (total, violent, property, disorderly conduct, or criminal mischief offenses) experienced statistically significant increases near a supportive housing facility after it was developed and began operating.¹⁴

Supportive housing, when it is provided to people leaving prison, can help promote public safety and other positive social outcomes. People leaving prison are especially vulnerable to homelessness because they often are banned from federal housing, face challenges reconnecting with family and friends, and lack the funds to afford available housing. A California study reported that 50 percent of Los Angeles and San Francisco parolees were homeless in 1997.¹⁵ As the number of people re-entering communities from prison has grown steadily with the incarceration rate, so too has the number of people who are at risk of homelessness.

¹¹ Mueller, Elizabeth J., and J. Rosie Tighe. 2007.

¹² National Law Center on Homelessness and Poverty. 1997. *Access delayed, access denied*. Washington, DC. Online at www.nlchp.org

¹³ Arthur Andersen LLP, University of Pennsylvania Center for Mental Health Policy and Services Research, K. E. Sherwood, and TWR Consulting. 2000. *The Connecticut Supportive Housing Demonstration program evaluation report*. New Haven: Corporation for Supportive Housing.

¹⁴ Galster, George, Kathryn Pettit, Anna Santiago, and Peter Tatian. 2002. The impact of supportive housing on neighborhood crime rates. *Journal of Urban Affairs* 24(3): 289-315.

¹⁵ California Department of Corrections. 1997. *Prevention parolee failure program: An evaluation*. Sacramento: California Department of Corrections.

A number of studies have found public safety benefits to providing housing to people leaving prison.

- A 1998 qualitative study conducted by the Vera Institute of Justice found that people leaving a correctional facility in New York City for parole who entered shelters for the homeless were seven times more likely to abscond during their first month after release than those who had some form of housing.¹⁶
- A study funded by the Fannie Mae Foundation revealed a 20 percent recidivism rate for people leaving Illinois correctional facilities for two specific long-term housing programs compared to a 50 percent recidivism rate for those who did not participate in the programs.¹⁷

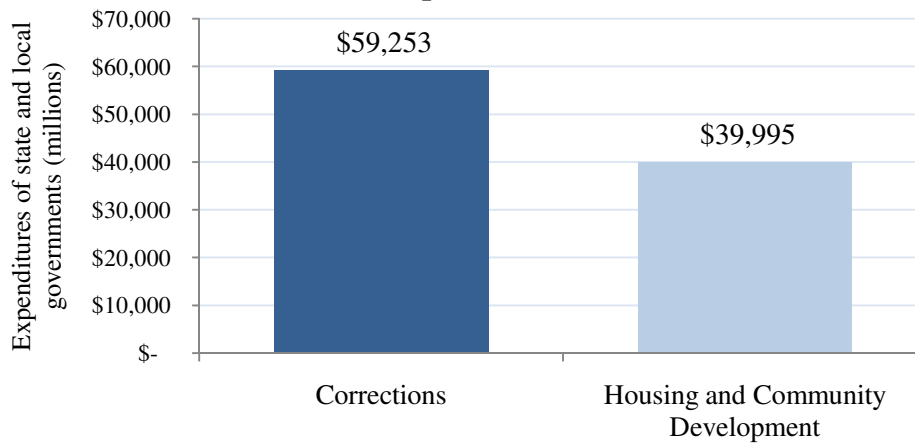
¹⁶ Nelson, Marta, Perry Deess, and Charlotte Allen. 1999. *The first month out: Post-incarceration experiences in New York City*. New York: Vera Institute of Justice.

¹⁷ Black, Kendall, and Richard Cho. 2004. *New beginnings: The need for supportive housing for previously incarcerated people*. New York: Corporation for Supportive Housing and Common Ground Community.

3) Supportive housing can reduce correctional spending.

Although research focused on several cities has shown that increased spending on supportive housing reduces correctional spending, jurisdictions continue to spend more on corrections than on housing. In 2005 state and local governments spent approximately one-third more on corrections than on housing and community development.¹⁸

State and local governments spent almost \$20 billion more on corrections than on housing and community development in 2005.



Source: U.S. Census Bureau, Governments Division. *State and Local Government Finances by Level of Government and by State: 2004-05*. www.census.gov/govs/www/estimate.html

A 2007 report by the National Alliance to End Homelessness reported on the cost-effectiveness of supportive housing compared to other services, including the criminal justice system.¹⁹ The analysis included several cities.

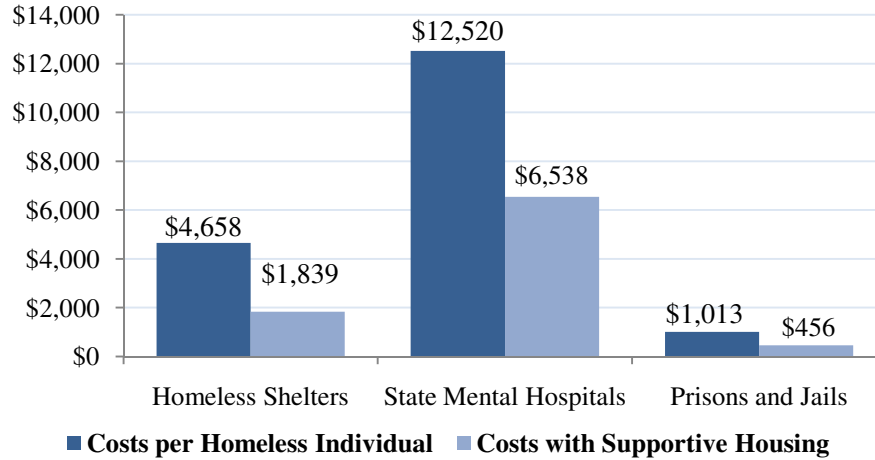
- Data from 4,679 New York City placement records of homeless individuals into supportive housing between 1989 and 1997 showed that the costs of supportive housing can reach up to \$17,277 per person per year.²⁰ By securing just one supportive housing unit, the city saved \$12,146 per year in public costs, including those costs associated with health and mental health care, shelter, prisons, jails, and other criminal justice agencies. Prior to placement in housing, homeless people with severe mental illness used an average of \$40,451 per person per year in social and criminal justice services. Placement in housing through this program was associated with marked reductions in shelter use, hospitalizations, length of stay per hospitalization, and time incarcerated.

¹⁸ U.S. Census Bureau, Governments Division. Undated. *State and local government finances by level of government and by state: 2004-05*. www.census.gov/govs/www/estimate.html, accessed July 26, 2007.

¹⁹ National Alliance to End Homelessness. 2007. *Supportive housing is cost-effective*. Online at www.endhomelessness.org

²⁰ Culhane, Dennis P., Stephen Metraux, and Trevor Hadley. 2002. The impact of supportive housing for homeless people with severe mental illness on the utilization of the public health, corrections, and emergency shelter systems: The New York-New York Initiative. *Housing Policy Debate* 13(1).

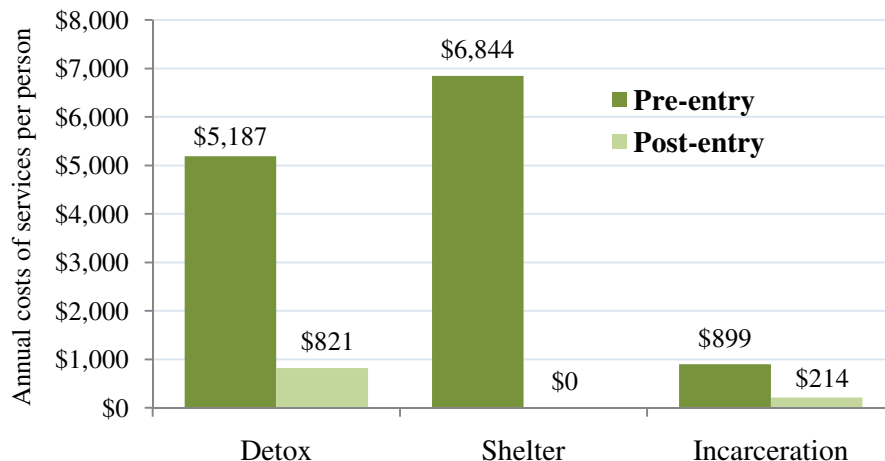
Supportive housing saved New York City \$9,358 per year in public costs associated with shelter use, mental health care and incarceration.



Source: Culhane, Dennis P., Stephen Metraux, and Trevor Hadley. 2002. The impact of supportive housing for homeless people with severe mental illness on the utilization of the public health, corrections, and emergency shelter systems: The New York-New York Initiative. *Housing Policy Debate* 13(1).

- A Denver program developed in 2003 to provide supportive housing for the chronically homeless realized substantial savings for the city. After placement of chronically homeless people in supportive housing, the number of people held at county jails decreased 60 percent, with a 76.2 percent reduction of nights spent in county jails. The associated costs of incarceration for the people served by this program declined from \$34,160 to \$8,120 a year, a reduction of \$26,040 or 76 percent.²¹

Supportive housing saves Denver thousands of dollars per person on public services annually.



Source: Perlman, Jennifer, and John Parvensky. 2006. *Denver Housing First Collaborative: Cost benefit analysis and program outcomes report*. Colorado Coalition for the Homeless, as cited in National Alliance to End Homelessness. 2007. *Supportive housing is cost-effective*. Online at www.naeh.org/content/article/detail/1200

²¹ Perlman, Jennifer, and John Parvensky. 2006. *Denver Housing First Collaborative: Cost benefit analysis and program outcomes report*. Colorado Coalition for the Homeless. Online at www.shnny.org/documents/FinalDHFCCostStudy.pdf

A 2004 study of nine U.S. cities found that supportive housing is the most cost-effective way to serve homeless individuals. In all nine cities—Atlanta, Boston, Chicago, Columbus, Los Angeles, New York, Phoenix, San Francisco, and Seattle—estimates find the cost of supportive housing to be considerably less than the cost of prison and/or jail.²²

Prison costs almost three times as much as supportive housing in Los Angeles.



Source: The Lewin Group. 2004. *Costs of serving homeless individuals in nine cities. Chart Book Report*. New York: Corporation for Supportive Housing.

Supportive housing is crucial for many people with mental illness who often have difficulty maintaining a stable housing situation and are vulnerable to homelessness.²³ Homelessness increases the likelihood that people with mental illness will have contact with law enforcement. Researchers at the University of Pennsylvania found that providing supportive housing to people with severe mental illness decreased the number of days people with severe mental illness spent in prison or jail 74 and 40 percent, respectively.²⁴

²² The Lewin Group. 2004. *Costs of serving homeless individuals in nine cities. Chart book report*. New York: Corporation for Supportive Housing.

²³ National Coalition for the Homeless. 2006. *Factsheet: Mental health and homelessness*. Online at www.nationalhomeless.org/publications/facts/Mental_Illness.pdf.

²⁴ Culhane, Dennis P., Stephen Metraux, and Trevor Hadley. 2002.

4) Increased spending on housing and community development is associated with reduced crime and reduced incarceration rates.

JPI analyzed national and state-level spending on housing and community development and corrections expenditures and compared these expenditures to violent crime rates and prison incarceration rates from 2000 to 2005. We found that an increase in spending on housing is associated with a decrease in violent crime at the national level and a decrease in incarceration rates at the state level.

An increase in spending on housing and community development paired with a decrease in spending on corrections is associated with both lower violent crime rates and lower prison incarceration rates.²⁵

Violent crime rates decreased when funding was shifted to housing from corrections.

	2000	2005	Percent change (2000-2005)
Housing expenditure as a percent of total expenditure	1.5%	1.7%	+10.74%
Corrections expenditure as a percent of total expenditure	2.8%	2.5%	-10.62%
Violent crime rate*	506.50	469.20	-7.36%

*Rates are the number of reported violent offenses (murder, rape, robbery, and aggravated assault) per 100,000 people in the population.

On average, the ten states that allocate a larger portion of their budgets to housing and community development (calculated and labeled as housing expenditure as a percent of direct expenditures) have lower incarceration rates than the ten states that allocated a smaller percentage.²⁶ Of those states that spend a larger portion of their budgets on housing, none had an incarceration rate higher than the national average. However, half of those states that allocate the least to housing and community development had incarceration rates higher than the national average, and two of those states had incarceration rates just below the national average: Arkansas was 1.6 percent lower and Idaho was 6.5 percent lower than the national incarceration rate.

²⁵ Violent crime data: FBI Uniform Crime Report, *Crime in the United States, 2000-2005*. Expenditure data: U.S. Census Bureau, Governments Division. *State and Local Government Finances by Level of Government and by State: 2004-05*. www.census.gov/govs/www/estimate.html. Corrections data: Harrison, Paige M., and Allen J. Beck. 2006. *Prison and jail inmates at midyear 2005*. Washington, DC: Bureau of Justice Statistics.

²⁶ Expenditure data: U.S. Census Bureau, Governments Division. *State and Local Government Finances by Level of Government and by State: 2004-05*. www.census.gov/govs/www/estimate.html. Prison incarceration rate data: Harrison, Paige M., and Allen J. Beck. 2006. *Prison and jail inmates at midyear 2005*. Washington, DC: Bureau of Justice Statistics.

On average, states that spend a higher percentage of their budget on housing have lower incarceration rates than states that spend less.

Ten states that allocate a larger portion of their budget to housing

2005	Housing as a percent of direct expenditures	Incarceration rate (per 100,000)
United States	1.7%	488.3
Massachusetts	2.5%	138.5
New Hampshire	2.5%	196.0
Vermont	2.4%	238.8
California	2.4%	456.0
Maryland	2.3%	405.3
Alaska	2.3%	373.8
Rhode Island	2.2%	179.6
Connecticut	2.1%	376.5
Maine	2.1%	153.0
Washington	2.0%	263.0
Average	2.3%	278.0

Ten states that allocate a smaller portion of their budgets to housing

2005	Housing as a percent of direct expenditures	Incarceration rate (per 100,000)
United States	1.7%	488.3
Mississippi	1.1%	→684.8
Texas	1.1%	→701.3
South Carolina	1.1%	→539.3
Wisconsin	1.0%	395.7
Arizona	1.0%	→501.1
Arkansas	1.0%	480.2
Oklahoma	0.9%	→655.6
Iowa	0.7%	289.3
Idaho	0.5%	456.6
Wyoming	0.3%	398.2
Average	0.9%	510.2

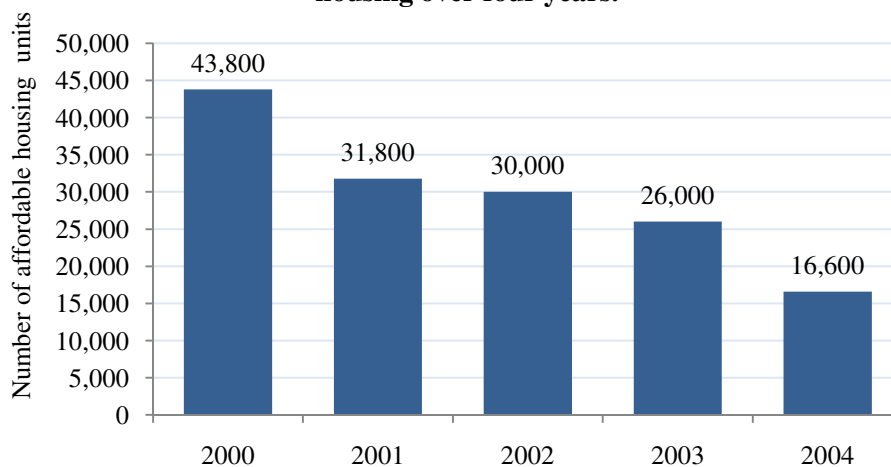
Sources: U.S. Census Bureau, Governments Division. *State and Local Government Finances by Level of Government and by State: 2004-05*. Harrison, Paige M., and Allen J. Beck. 2006. *Prison and jail inmates at midyear 2005*. Washington, DC: Bureau of Justice Statistics.

Recommendations

Positive investments in communities and community development through housing (such as supportive housing and affordable housing) can yield benefits in public safety, cost savings, and long-term community enrichment. Stable housing is the foundation for education, employment, and access to other social programs and services. Compared with people who face barriers in their housing situations, people in stable living environments are better able to make investments in themselves, their families, and their neighborhoods.

In 2002 nearly 2,000 people returned from prison to the District of Columbia.²⁷ During the same time period, the city experienced a dramatic loss of affordable housing.²⁸ Without affordable housing, people returning from prison are more likely to face challenges obtaining employment, staying in treatment programs, and getting other services that would help them reestablish themselves in the community. Though it may be possible for people returning from prison to move to surrounding suburbs, the value of maintaining ties to family and community within the city is crucial for people returning from prison to successfully reestablish themselves in society.

The District of Columbia lost 62 percent of its affordable housing over four years.



Source: Rodgers, Angie. 2005. *New census data show DC's affordable housing crisis is worsening*. Washington, DC: DC Fiscal Policy Institute. Online at www.dcfpi.org/9-13-05hous.pdf.

²⁷ Bureau of Justice Statistics. 2002. *Correctional populations in the United States*. Washington, DC: Bureau of Justice Statistics. Harrison, Paige M., and Jennifer C. Karberg. 2003. *Prison and jail inmates at midyear 2002*. Washington, DC: Bureau of Justice Statistics. Harrison, Paige M., and Jennifer C. Karberg. 2004. *Prison and jail inmates at midyear 2003*. Washington, DC: Bureau of Justice Statistics. Lattimore, Pamela K. 2004. *National portrait of serious and violent offender reentry initiative*. Washington, DC: Urban Institute. Cited and analyzed in Roman, Caterina Gouvis, Michael J. Kane, and Rukmini Giridharadas. 2006. *The housing landscape for returning prisoners in the District of Columbia*. Washington, DC: Urban Institute.

²⁸ According to the DC Fiscal Policy Institute, affordable housing in this context is housing that rents for \$500 or less per month or homes valued at \$150,000 or less, but not necessarily subsidized by the government. Rodgers, Angie. 2005. *New census data show DC's affordable housing crisis is worsening*. Washington, DC: DC Fiscal Policy Institute. Online at www.dcfpi.org/9-13-05hous.pdf.

Research limitations

Some studies produce data that associate crime with the presence of or proximity to subsidized housing such as supportive housing or affordable housing. Other researchers conclude that statistical association with crime results from factors specific to particular housing (such as an allocation policy that concentrates crime-likely individuals in already-crime-prone spaces), suggesting that implementation of carefully thought out policy on subsidized housing (regulating factors such as design and allocation) has the potential to lower or remove statistical correlations between governmentally subsidized housing and crime.²⁹

Although investments in housing and other social factors have been shown to promote public safety and healthy communities, there is no single solution that will reduce the chance that a person will be involved in criminal activity. The research is not conclusive on any one factor that would solve every community's public safety challenges, as different communities have differing needs and what works for one may not work for another. All of these social factors should be considered in the context of individual communities in order to establish policies that effectively ensure public safety.

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²⁹ For example, in 1999 researchers at the New South Wales Bureau of Crime Statistics and Research explored the issue of crime and public housing in Sydney, Australia, concluding that statistics associating subsidized housing with crime reflected the allocation of crime-prone individuals to subsidized housing; these researchers suggested that adjusting allocation policy will influence the statistical relationship between subsidized housing and crime. Weatherburn, Don, Bronwyn Lind, and Simon Ku. 1999. Hotbeds of crime? Crime and public housing in urban Sydney. *Crime and Delinquency* 45(2).