

**From:** Shannon Nazworth [<mailto:snazworth@abilityhousing.org>]  
**Sent:** Wednesday, May 29, 2013 6:21 PM  
**To:** Steve Auger; Kevin Tatreau  
**Subject:** comments concerning Limited Development Area

Steve & Kevin,

Thank you for the continuing opportunity to provide public comments throughout the rule development process. Thank you as well for your recent increased focus on the housing needs of special needs and homeless households. These individuals and families will, unfortunately, always be those with the greatest need.

Concerning the draft LDA restrictions, Homeless and Special Needs projects should be exempt from all LDA's. A review of the proposed LDAs shows several counties with a complete ban on any projects, including projects for the Homeless and Persons with Special Needs. I can assure you, there is no county in this state without the need for housing for these households. No county should have a 100% ban on these projects.

For those LDAs encircling a distressed Guaranty Fund project, the need to preserve the projects is understandable. But a Homeless or Special Needs project is not competition for or a possible source of cannibalization of a distressed Guarantee Fund project. Were the Guarantee Fund project a housing option for the target tenants of the Homeless or Special Needs projects, they would already be living at the project.

If a restriction for Homeless and Special Needs projects is to remain, please consider reducing the limitations:

1. exempt projects that set-aside 80% or more of their units to special needs and/or homeless households; and/or
2. reduce the LDA around Guaranty Fund projects to a smaller radius of one or two miles

Thank you, again, for this opportunity to provide comments.



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*Providing quality, affordable community-inclusive housing for individuals and families experiencing or at risk of homelessness and adults with a disability.*