



May 10, 2024

Re: Grace Terrace Community Meeting Questions & Answers

The attached document contains questions and answers from question cards that were collected at the 4/16/24 Community Meeting for Grace Terrace. The note cards have been transcribed as written with the only editorializing being to help clarify the question. The Community Meeting was an informational session held by the developer, Full Circle Communities, (Full Circle) to answer questions and update the community on design changes since the 12/4/23 Village Board meeting. These questions and answers are not an exhaustive list of information on the project and are specifically addressing community questions that were raised at the Community Meeting.

Please see below for a brief overview of the project:

Grace Terrace is a proposed 25-unit permanent supportive housing (“PSH”) development targeted toward veterans and persons with disabilities earning between 30%-50% Area Median Income (“AMI”). The development is located at 1519-1625 S Arlington Heights Rd in Arlington Heights, IL. The proposal offers (20) one-bedroom and (5) two-bedroom universally designed units including Americans with Disabilities Act (“ADA”) and adaptable units to meet the needs of tenants.

For more information on Grace Terrace, please visit the Village of Arlington Height’s [project page](#) and/or Full Circle Communities’ [project page](#).



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General

1. What is permanent supportive housing?

Permanent supportive housing is a type of housing where tenants have leases, meaning it's not transitional or time limited. Additionally, supportive services are offered to residents, though they are not required as part of tenancy. Please note that while Grace Terrace is permanent supportive housing, it is designed for independent living, meaning there will be no full-time medical care on-site. People in need of that level of care would not be suitable for this development.

2. Government subsidized housing for low-income people is essentially a housing project, correct?

This is privately-owned affordable housing that is receiving government funding to develop permanent supportive housing. A "housing project" often has connotations of public-owned affordable housing projects that were built back in the mid-20th century such as Cabrini-Green Homes. Grace Terrace will not be a public-owned affordable housing project. The critical difference is that Full Circle is accountable to multiple oversight agencies that ensure we comply with our funding source requirements.

3. How many people in Arlington Heights really need this housing?

According to the 2019 American Community Survey (ACS), 36% of renters in Arlington Heights are housing cost burdened (spend more than 30% of income on rent and utilities) and 7,500 individuals have a disability. Additionally, approximately 3,000 veterans live in Arlington Heights. Full Circle's market study, performed by a third-party analyst, confirms the large demand for supportive housing and states that "the proposed location and design will be viewed favorably, and the market can support more than the number of units planned. Based on demographics, wait lists, and commentary from service providers and PSH developers, there is a great deal of demand in the market for affordable supportive housing."

4. Why was this site chosen?

The North-Northwest Suburban Task Force on Supportive Housing for Individuals with Mental Illness ("the Housing Task Force") brought us into this project. The Housing Task Force began looking for a project shortly after Heart's Place opened in 2019 because of continued demand for this type of housing. They identified three sites that were on the market and could be a good fit for permanent supportive housing: the 1519 S Arlington Heights Rd site, a lot owned by the Church of the Incarnation (a Methodist church on Golf Rd, just west of Arlington Heights Rd), and one on the corner of Rand and Chestnut. Full Circle staff visited all three sites. The church

site was too oddly shaped for an apartment building to fit (an architect tried several site layouts and nothing worked). Full Circle also worked on a possible site layout for the Rand and Chestnut site, but it was too expensive for a 25-unit building (while we were working on that, another party bought the site which became Crescent Place, a 40-unit affordable housing development). The owner of the 1519 S Arlington Heights site liked the mission of the project and wanted to sell the property to us.

This site was also selected for its proximity to amenities and public transit. The site is within 0.5 miles of local parks, grocery stores, restaurants, health clinics and pharmacies. Just south of the site at Golf & Arlington Heights Rd is the Pace Bus Route 208, which connects riders to Metra and CTA stations.

The Housing Task Force has been part of the Arlington Heights community for a long time and knows the need is strong for housing for people with disabilities. The Housing Task Force knows that Full Circle is an owner and manager that develops high-quality properties, so they trusted us to bring this project to Arlington Heights.

5. Bus services only runs of golf Rd- Only hospital is on Golf Rd is Skokie Hospital. Why not renovate nursing home across from Northwest Community Hospital?

Full Circle does not own the nursing home across from Northwest Community Hospital and instead owns the property at 1519-1625 S. Arlington Heights Rd. Please reference question #4 for more information on site selection.

6. Have [Full Circle Communities] built a property/building and sold it ever?

Full Circle has never built a property/building that we later sold. However, FCC has sold one property that it acquired in the state of Florida because it sat in a flood plain.

7. What is comparable to Grace Terrace? Pearl Street Commons?

Yes, Pearl Street Commons is our most comparable project to Grace Terrace. Pearl Street Commons is a 25-unit permanent supportive housing development in McHenry, IL that opened in late 2018. Like Grace Terrace, it is designed for veterans and persons with disabilities. It has universally designed one- and two-bedroom apartment and service provision offering onsite case management and advocacy.

8. Are you the same builder/organization as Hearts Place & Evanston?

We are not the builder/organization that built and manages Heart's Place. It's not clear what development is being referred to in Evanston, but Full Circle does not own or manage any buildings in Evanston, IL.

9. How can we believe all the wonderful stuff you talked about if your answers were proven to be lies?

Full Circle takes its reputation as a high-quality affordable housing developer seriously, and we do our best to accurately represent our experience and our proposal. We don't believe any of our answers to community concerns have been proven to be lies.

10. Josh [President & CEO of Full Circle Communities], according to your statement during the planning committee, when asked about having 1 star on Charity Navigator, you were not aware of the rating. You did correct it and changed your rating. My question is, why did you not disclose it during the board meeting on 12/4? Why did you say you don't know where that came from?

As far as Full Circle is aware, we have always had a 4-star rating on Charity Navigator, which was confirmed when we checked the website.¹ No additional information was provided to Charity Navigator after the Plan Commission meeting. It should be noted that there are many organizations with the name "Full Circle" in it, so it's possible the original speaker that identified Full Circle Communities as having 1-star mistook our organization for another one.

11. How many people in this room are not from Arlington Heights? How many people in this room live within 4 blocks of the development?

This question was addressed during the Community Meeting held on 4/16/24. Nearly all of the people in the room were from Arlington Heights and more than half of the room lived within four blocks of the development.

12. Why do you only have your side speak but do not let the opposing party speak? Shouldn't you let both sides speak like any town hall meeting does it?

The Community Meeting held on 4/16/24 was meant to be an information meeting on the project and to discuss design changes since the last Village Board meeting on 12/4/23. As stated during the meeting, the intention was to answer as many questions as possible, which is why we implemented question cards. We got through as many question cards as possible in the time allotted. We have included all of the question cards we received in this Q&A document.

The best place for public comment on the project would be at any of the many public meetings that have been held, including the forthcoming Village Board meeting (date TBD; likely to be scheduled in May).

¹ <https://www.charitynavigator.org/ein/364382850>

Community & Zoning Process

13. How quickly will you respond to all the questions [asked] today? Will it be several months just like after the last meeting?

Full Circle transcribed the almost 100 question cards received and completed the formal response on 5/10/24, 18 working days after the Community Meeting held on 4/16/24.

After the 12/4/23 Village Board meeting, there was a list of community concerns given to us by Village staff. We used that list of concerns to inform our investigation of multiple design alternatives to best address neighbor concerns while still providing a high-quality development that meets the needs of the future tenants. These alternative designs were also shared with Village staff for their feedback.

We were asked to provide a formal written response to the list of concerns in February. We sent the response to Village staff on 2/23/24 and sent a revised response on 4/3/24, which was circulated to the public.

14. As a resident of Arlington Heights, how can we act to support the project and to work support Village Officials.

Thank you for your support. The best way you can show your support for the project is by reaching out to your local officials and letting them know you think this is an important project for the community of Arlington Heights. Another way to support the project is by showing up for the Village Board meeting (date TBD) and expressing your support during public comment.

15. Why are there no facts/speeches of this form of housing? Only hear positives, and that is impossible!

As part of the public process, there have been several public meetings where the public has expressed opinions, positive and negative, regarding this project. As the developer and owner of the development, we believe this will be a positive asset in Arlington Heights and have been highlighting its benefits throughout the community process and have also worked to address questions and concerns as they have come up.

16. Pearl Village [Pearl Street Commons] in McHenry seems to be a success. Were people who attended an information session like this one before construction as equally animated as this group tonight? Do you know how these neighbors feel now?

During the community process for Pearl Street Commons, there were direct neighbors that had concerns about the project. The project was ultimately approved and built in 2018. Full Circle does not hear from the neighbors regarding issues with the property.

The City of McHenry is so happy with the project that they've asked us to develop more permanent supportive housing at an adjacent site. We have also received a letter of recommendation from the Director of Economic Development of the City of McHenry affirming that, "[Pearl Street Commons] is now an asset to [the McHenry] community, and throughout the process, Full Circle was a reliable and responsive partner."

17. How were houses selected to get the postcards on this event?

We sent postcards to the nearest 250 households of the project, including addresses that signed a petition this past fall, which extends to a greater than 1000' radius of the project site. We proactively increased the amount of outreach above and beyond what is required by the Village (a 250' radius surrounding the property line).

18. Do you own the land currently? Why are [you] looking to sell part of the land you just got? North side? If you are not meeting zoning needs, why sell the extra land? Why not use extra land for lower height to building?

Yes, we currently own the land. We are considering selling the northern parcel of the land per coordination with Village staff. Staff asked that we consider this since the site was so large for the size of our building. We are still talking with the owners of the vacant lot to the north to see if they are interested in purchasing our northern parcel to incorporate it into their land. If our northern parcel does not get sold, Full Circle will continue to own and maintain it as vacant land.

The building height is largely dictated by design and cost considerations. It is more efficient and economical to build a three-story building than a building of lower height. Village staff also asked us to align our drive aisles with the already existing curb cut at the memory care facility to the south and Emerson Street to the north, which limits our building footprint and length in the north-south direction.

We are requesting a zoning change (from "Office-Transitional"/O-T to "Institutional"/I), which would need to happen regardless of the height of the building to accommodate the use of the building. Under the I zoning, up to four-stories is allowed. We are proposing a three-story building, and therefore not violating the requested zoning requirements. Please note that while rezoning from O-T to I allows for a height of up to 45' (four stories), we are proposing a three-story building that is 35'-9", which is only 5'-9" taller than what is currently allowed under the O-T zoning (30'/two stories).

19. Why not make 1 story? Use all the land

Please see response to question #18.

20. 1) Thought the area was zoned commercial? How did this change? 2) Feel like this building will lower property values in my neighborhood!

The current zoning is “Office-Transitional”/O-T and we are requesting a zoning change from the Village Board to change the designation to “Institutional”/I.

This multi-parcel site has been vacant since 2016. Per the Village Staff Report from the 12/4/23 Village Board meeting, the Staff Development Committee found that market demand for new office developments is weak, which is likely why it has been vacant for so long under the current O-T zoning. Rezoning to “Institutional”/I would allow vibrant permanent supportive housing to be developed on this long-standing vacant land.

Please refer to the Property Values Addendum located on the [Village website](#) for more information.

21. Does this conform to current zoning? How do you determine property values go up with low income housing?

Please reference question #18 for more information on our zoning change request.

Full Circle does not make any claims that property values increase due to the introduction of affordable housing, only that data suggests the introduction of affordable housing does not negatively impact surrounding housing values.

Please refer to the Property Values Addendum located on the [Village website](#) for more information.

22. Did you purchase the property without a contingency for zoning approval?

We did have a contingency to acquire the land, but the contingency expired. Since purchasing the land, we are continuing to work to get important affordable housing built on this site.

23. Can this development be located on International Plaza site where land has been designated for this type of development? This is the site at Arlington Heights Rd & Golf.

We do not own the International Plaza site and are instead proposing the project on the land that we do own at 1519-1625 S. Arlington Heights Rd. We think this is an ideal location for permanent supportive housing as it is close to many amenities and public transportation.

According to the Village’s website, the International Plaza site already has a proposed development.²

24. Do the rules change if the building gets sold?

No, the property must operate as affordable housing for at least the next 30 years. Full Circle will be the long-term owner of the building and has no plans to sell it even after the initial 30 years. Additionally, per Village staff, as part of our zoning, all units within the development shall be restricted so that they remain in perpetuity as an affordable housing development for individuals with disabilities and meet all Housing and Urban Development (HUD) defined income levels.

25. Has the Plan Commission ever given you an approval to date?

The Plan Commission is a recommending body that gave us a 4-3 “no” recommendation. Two members of the commission were in absentia and unable to vote.

26. Why is it taking so long to get this much needed project underway?

The zoning process for this project has been extensive and our most recent continuance at the 12/4/23 Village Board meeting set us back several months as we needed to address concerns regarding the site layout. We feel that our most recent proposal presented at the Community Meeting on 4/16/24 has addressed many of the concerns that we heard from neighbors and the Trustees, and we are hopeful that the proposal will get a “yes” vote at our next Village Board meeting (date TBD).

27. The need is so great, why can’t we have more units open sooner?

At the time when we secured our IHDA PSH grant funding, the project was limited to only 25 units. In terms of our timeline, we must get through zoning approvals [please reference question #26 for more context] and then close on our financing before we can start construction. We are hoping to close on our financing by the end of the year with a construction start in early 2025. We expect about 12 months of construction meaning the property would ideally be open and ready for lease-up by early 2026.

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https://www.vah.com/government/departments/planning_community_development/developments_projects/_international_plaza_urban_street_project.php

Property Management & Tenant Selection

28. What is the management org and how often are they at the facility?

The management organization is Full Circle Management, Full Circle's in-house management company. There will be three staff members regularly on site: one full-time property manager between standard business hours (approximately 9am-5pm Mon-Fri), one shared maintenance staff member to be onsite as needed, and one onsite service staff member to be a full-time position. The services staff will determine their hours based on the needs of the residents. There are times when it makes more sense for providers to meet with tenants in the evenings or host events on the weekends.

29. What are the steps for response when there is a call in the 24hr phone?

Calls can be placed at any time, day or night, by dialing our office line. Upon calling, the caller will have the option to press 1 if the matter is urgent. Pressing 1 will directly connect them with a live representative who will handle the situation. Subsequently, the pertinent information will be relayed to the designated on-call personnel.

In the event that the initial on-call person does not respond after two attempts, the system will automatically escalate the call to the next individual on the designated contact list, with our SVP of Property Management being the final point of contact.

30. Who is in charge of the 24 hr phone line? Is it a recording?

There is a live third-party, monitored service line that answers the 24-hour phone line and connects the individual with either our maintenance staff or property management team.

31. If there is an incident in the middle of the night or during the weekends & someone calls the 24hr phone line what is the turnaround time response?

Across our portfolio, the average response time is approximately 30 minutes.

32. Are your future residents exclusive to Arlington Heights residents + applicants on the outside?

Per the federal Fair Housing Act, we cannot discriminate in our tenant selection process based on where people currently live. However, we have found that residents at our properties are either from the community, a neighboring community, or have family or employment in the community. Our work with the Housing Task Force shows us that there is strong demand for these units in Arlington Heights, and we'll work to make the waiting list available to local residents.

Before the property finishes construction, Full Circle will open an interest list for people interested in living at the property. When lease up starts, Full Circle will market the interest list to the local community and work with prospective residents to get them on the Housing Authority of Cook County (“HACC”) site-based list. Prospective tenants will then go through the HACC and Full Circle screening process to ensure they qualify for tenancy.

33. Where are the residents coming from?

While we can’t implement a local preference (although we plan to market the interest list locally), across our portfolio, the vast majority (more than 80%) of the residents of our properties already have a connection to the community prior to tenancy. In focus groups conducted by Full Circle at our properties, residents often mention going to school and growing up in the area, along with connections to local businesses and churches. Supportive and affordable housing provides an opportunity for people to live independently and stay connected to a familiar neighborhood and nearby family.

34. What guarantees that this will only be for veterans & disabled? Who is mandatory? Admissions of residents -State-County-Village?

Our tenant selection plan, which is approved by our funders, including the Illinois Housing Development Authority (IHDA) and the Housing Authority of Cook County (HACC), outlines that disability is a requirement for tenancy and veterans will have a preference, meaning they will move to the top of the waitlist.

35. How do you guarantee that the occupants present at the address are really with an ADA disability and qualify in this occupancy and this community will not be presented to migrants?

We will market the interest list with local organizations that work with veterans and persons with disabilities. We’ll then give the Housing Authority of Cook County (HACC) our interest list for them to develop a site-based list. HACC will verify veteran and disability status. Per our tenant selection plan, tenants will be required to have an ADA disability and veterans will receive preference, meaning they will move to the top of the waitlist.

Federal funds can only be used for people with citizenship. Through our tenant selection process, applicants need to provide an SSN or a letter that one is pending.

36. Who will check and vet potential tenants? What mental disabilities?

Prospective tenants will go through the Housing Authority of Cook County and Full Circle tenant selection processes [please reference question #35 for the vetting process].

Full Circle properties are disability neutral; we cannot include or exclude any specific disability. Disabilities may be physical, developmental, and/or mental in nature. Our properties are independent living and do not include 24/7 medical care, so they may not be the right living situation for everyone. All units are universally designed, and the property will include ADA and adaptable units.

37. The neighborhood would like to understand composition of tenant base for this tax payer funded project. *Assuming predominance of mental health as disability

The tenant selection is focused on persons with disabilities with a preference for veterans. As mentioned in response to question #36, the property will be disability neutral as we cannot, nor do we want to, discriminate against anyone with a disability, including people with mental health issues.

38. You could at some point have children living there? Expect few to no children? Does that mean it is not a guarantee?

It is illegal to prohibit children from living at the property, but in our experience with this unit mix and targeted population, there will be very few (if any) children living at the property. Pearl Street Commons, which is a 25-unit permanent supportive housing development in McHenry, IL, currently has 23 residents over the age of 18 and three residents under the age of 18.

The proposed unit mix at Grace Terrace is not conducive to families. There are (20) one-bedroom apartments and (5) two-bedroom apartments. While the two-bedroom apartments could potentially accommodate children, they are also often occupied by couples or individuals with disabilities who have live-in aides.

39. How is tenant policy enforced including violations if staff are only onsite during normal business hours?

Any violations would be tracked through the robust camera system [please reference question #72 for a description of our security plan] along with neighbor and tenant concerns that are reported to our property management team. We will investigate any reports received. If there are lease violations, then we connect the resident with the services team while also starting the eviction process with our property management team. We try to avoid displacement of residents where possible, so if it's possible to resolve the issue with our services team, that is the first approach we'll take. If it's necessary to follow through with an eviction proceeding, our property management team will do so.

40. Will the drug testing policy apply to those currently engaged in substance abuse treatment (e.g methadone addiction treatment)? How is that enforced after taking residency?

We do not implement drug testing at our properties. FCC employs a blended management approach at all its PSH properties. Blended management is a collaborative, team-based approach to working with residents. Blended management requires a distinct but complementary role for ownership, property management and supportive services. It is critical that these distinct roles develop common goals, language, and procedures through blended management to provide the best outcomes for our residents and the property. Communication expectations for blended management are intentionally robust so that staff can proactively resolve any issues on-site and make sure residents' needs are being met. Through the blended management approach, we are able to identify if there are issues with substance abuse and respond to it through both services and property management. If the offense is a material lease violation, an eviction procedure will be pursued.

Please note that per the Americans with Disabilities Act (ADA), the definition of "person with a disability" does not include current users of illegal controlled substances.³

41. Do you accept housing vouchers?

In the case of Grace Terrace, all units have project-based vouchers, so everyone coming in will benefit from a voucher for that unit. We can't layer a tenant voucher on top of the project voucher.

42. How does it work if a potential resident doesn't have income?

We do not have work requirements, as that would restrict access for retired residents or those with a disability that prevents employment. However, Full Circle requires evidence that the resident can pay for living expenses. People without employment income would likely be receiving social security or disability income which would help cover living expenses. Residents will also benefit from rental assistance that keeps their portion of the rent affordable. On-site services staff can also help residents increase their income self-sufficiency.

43. How many leases are less than 12 months at your properties!

Grace Terrace will not have lease terms under 12 months.

44. How long do your tenants usually live at your properties?

There's no limit on how long people can stay in our buildings and we generally find that our tenants make their units their home. As previously mentioned, our leases are 12 months so that

³ https://www.hud.gov/program_offices/fair_housing_equal_opp/disability_overview#general-examples

is the minimum tenancy. There is about a 15% turnover rate across our portfolio from year to year.

45. How long do residents stay when they move in AND why do they typically move out?

Please reference question #44 for residents' duration of stay.

Reasons for moving out vary greatly from property to property. For example, at a senior development, a resident may be moving to relocate to assisted living. If a resident with a project-based voucher (PBV) receives a housing choice voucher (HCV), they may choose to relocate. Residents may relocate for jobs or school. These are just a few examples of many for why someone would choose to relocate to another property.

46. Waiting list, who handles that? Is it handled by a primary agency, HUD, or FCC?

Before the property finishes construction, Full Circle will open an interest list for people interested in living at the property. When lease up starts, Full Circle will market the interest list to the local community and work with prospective residents to get them on the Housing Authority of Cook County ("HACC") site-based list. Prospective tenants will then go through the HACC and Full Circle screening processes to ensure they qualify for tenancy.

47. Can you walk me through the application process. The initial step is "preliminary" application? What does that mean? What happens after?

The interest list will be posted after the zoning process, and interested parties will then be notified of the development status. About six months before construction completion, interested people will be notified, and screening with interested individuals will begin. The individuals will be referred to the Housing Authority of Cook County, which will screen their veterans and disability status and then refer them to Full Circle, where Full Circle will conduct its screening process (verify income status, criminal background checks, etc.).

48. On your screening process, who is the 3rd party that would confirm an applicant's disability? HUD or private agency?

Since we are receiving project-based vouchers from the Housing Authority of Cook County (HACC), they would verify disability status. Disability must be confirmed by a third-party medical professional.

Services

49. What services will be provided for the services & who will pay for them?

At Grace Terrace, a case manager will work with residents to identify their service needs and goals, but examples include asset-building, case management, socialization and community building, and health & wellness. Full Circle invests 75% of developer fees and ongoing cash flow back to providing services to residents. For an example of service provision at a similar development, see our response to questions #50 & 51.

50. How many social workers and other therapists see clients at Pearl Street? How many hours a week are they meeting with residents?

There are currently five Association for Individual Development (AID) staff members providing services at Pearl. There are two case managers, two counselors, and one social worker. We have a designated case manager contracted to provide at least 16 hours per week. Other AID staff members see their clients once per week for about an hour. In total, not accounting for residents who have independent case managers or use other services, a minimum of 20 hours of services per week are provided to residents by AID staff.

51. So you have supportive services for Pearl Street in McHenry? What type? How do you identify what services are needed by your residents?

Services are free for residents, wraparound, and voluntary. They include general case management, therapy, counseling, psychiatry, medication management, finance management, community integration services, assistance with activities of daily living, and assistance with physical health care providers (linkages).

In addition to being intentional about partnering with service organizations that are an appropriate fit for the population served at the outset (“appropriate fit” –as determined by previous experience, alignment of values, cultural fit, etc.), we rely on direct resident feedback via Needs Assessment Surveys to decide what services are offered at the site. Every year after that, we use Satisfaction Surveys to monitor utilization and continued alignment with residents’ needs.

52. What is the plan for after-hours mental health crises at the facility?

Similar to other independent living facilities, tenants of Grace Terrace should contact emergency services if there is a medical emergency. If the situation is not an emergency, residents can also contact their service provider.

Our Work with the Housing Task Force

53. Is your organization registered with the government as the North West Suburbs Task Force on Supporting Individuals with Mental Health Illness? Why don't you use your active name here? Why hide it?

Full Circle is working with the non-profit advocacy organization the North-Northwest Suburban Task Force on Supportive Housing for Individuals with Mental Illness, more commonly referred to as the "Housing Task Force." We are not trying to hide anything; the full legal name is just long and not their more commonly understood name of the "Housing Task Force."

54. On the handouts you describe your task force as a volunteer non for profit for supportive housing for individuals with disabilities on your website, you say it's for individuals with mental illness. Why use one distinction for your donors and another to sell us your development being good for our neighborhood with families and kids?

Please reference our response to question #53.

Financing & Construction Costs

55. You get your funding from grants? What happens when that stops? What happens to the building/residents?

The construction financing comes from public grants and private debt, which have already been secured and committed. The income generated from rents covers the operational expenses for the building. The development will not rely on any ongoing grant-writing to support property operations.

Full Circle also reinvests capital back into our properties. Our service model is to return 75% of developer fee and ongoing cash flow to providing services to residents.

56. Who is funding this? Is Arlington Heights getting \$ back from you for ok-ing this?

The Village is not providing funding to build or support this development. We are also not giving the Village any money other than what is required as part of the typical development and ownership process (impact fees and property taxes). Please see response to #70 for an explanation of the impact fees.

57. For \$13M Project, 25 units = \$500K +/-unit median home price is less than \$450K how can it be so expensive?

There are several factors that drive cost: land is expensive in Arlington Heights, there are Village requirements that increase costs (including utility improvements and larger minimum unit sizes), green certification adds construction costs, and general increased construction costs due to inflation. We need and want to build a high-quality project for the long term. It would be a bigger issue if we were not spending enough money and were building and operating a low-quality development.

58. \$13 Million for 25 units. \$500,000/unit seems way expensive?

Please reference question #57.

Property Values & Taxes

59. For property value impact, what are the average prices for the properties shown in the analysis and how does that compare to the avg housing price where this property will go? Are they similar?

Below is an analysis of single-family home sales from 2019 through 2023 within a 1-mile radius of Heart’s Place and Linden Place⁴, two completed affordable housing developments in Arlington Heights, and of the homes surrounding the Grace Terrace⁵ site. All locations are compared to the average appreciation rate of Arlington Heights and the State of Illinois.

Heart’s Place (Arlington Heights, IL)

Year	Average Sale Price	% Increase	Average annual increase within 1-mile of Heart’s Place (2019-2023)	
2019	\$331,021		8.05%	
2020	\$347,135	4.87%		
2021	\$402,810	16.04%	VAH Average (2019-2023) 5.15%	IL Average (2019-2023) 6.11%
2022	\$435,282	8.06%		
2023	\$449,296	3.22%		

⁴ Multiple Listing Service (MLS) search for single family homes sold from 2019-2023 around Hearts Place and Linden Place, 4/10/24.

⁵ Multiple Listing Service (MLS) search for single family homes sold from 2019-2023 around Grace Terrace proposed site, 4/23/24.

Linden Place (Arlington Heights, IL)

Year	Average Sale Price	% Increase
2019	\$ 367,069	2.92%
2020	\$ 373,253	1.68%
2021	\$ 439,295	17.69%
2022	\$ 439,007	-0.07%
2023	\$ 479,897	9.31%

Average annual increase within 1-mile of Linden Place (2019-2023)
6.31%

VAH Average (2019-2023)
5.15%

IL Average (2019-2023)
6.11%

Grace Terrace (Arlington Heights, IL) (pre-construction)

Year	Average Sale Price	% Increase
2019	\$396,863	
2020	\$395,786	-0.27%
2021	\$459,478	16.09%
2022	\$452,394	-1.54%
2023	\$500,923	10.73%

Average annual increase within 1-mile of Grace Terrace (pre-construction) (2019-2023)
6.25%

VAH Average (2019-2023)
5.15%

IL Average (2019-2023)
6.11%

As demonstrated here, the average value appreciation rates of the homes surrounding the Grace Terrace site are similar to homes surrounding other affordable housing developments prior to the completion of Grace Terrace.

60. There are three supportive living developments that exist or are planned within a one-mile radius:

- **Linden Place**
- **Grace Terrace (planned)**
- **International Plaza (Planned)**

How can you assure us that with that large degree of change, property values will not drop?

Can you do further analysis and release all the supporting data?

Full Circle cannot provide guarantees in this matter since many factors contribute to property value change. However, based on our experience, neighboring properties have not experienced a negative impact on their property values after the completion of our properties.

Since 2 of the 3 developments referenced here have yet to be completed, the best way to answer this question would be to look at an existing example. Using the Multiple Listing Service (MLS), we looked at sold property data⁶ within a 1-mile radius of 3 existing affordable housing

⁶ Multiple Listing Service (MLS) search for single family homes sold from 2019-2023, 4/23/24.

developments in Arlington Heights that are in close proximity to each other and compared their appreciation rates to that of Arlington Heights from 2019 through 2023. FCC does not own or operate any of these developments.

All supporting data was provided to Village staff.

Parkview Apartments (212 N Dunton, Arlington Heights IL 60004)

Year	Average Sale Price	% Increase	Average annual increase within 1-mile of Parkview Apartments (2019-2023)	
2019	\$413,933		6.93%	
2020	\$427,249	3.22%		
2021	\$482,677	12.97%		
2022	\$509,022	5.46%		
2023	\$540,007	6.09%		
			VAH Average (2019-2023)	IL Average (2019-2023)
			5.15%	6.11%

Cedar Village (320 W Campbell St, Arlington Heights IL 60005)

Year	Average Sale Price	% Increase	Average annual increase within 1-mile of Cedar Village (2019-2023)	
2019	\$407,652		6.8%	
2020	\$429,104	5.26%		
2021	\$474,193	10.51%		
2022	\$498,398	5.10%		
2023	\$529,849	6.31%		
			VAH Average (2019-2023)	IL Average (2019-2023)
			5.15%	6.11%

Albert Goedke Apartments (215 W Miner St, Arlington Heights IL 60005)

Year	Average Sale Price	% Increase	Average annual increase within 1-mile of Goedke Apartments (2019-2023)	
2019	\$417,223		6.47%	
2020	\$426,771	2.29%		
2021	\$471,190	10.41%		
2022	\$504,482	7.07%		
2023	\$535,295	6.11%		
			VAH Average (2019-2023)	IL Average (2019-2023)
			5.15%	6.11%

This data analysis shows that although these three developments are close to one another, the appreciation rates of the surrounding homes outpaced that of the Village during the same period. Based on this information, we believe Grace Terrace’s proximity to Linden Place and International Plaza will not harm our neighbors' property values.

61. Property Value doesn't matter on averages. Depends on peoples likes and wants so to people that dislike this idea lowers it values. Common sense. Please respond to this.

The analysis provided during the community meeting and in the Property Values Addendum document as part of our outreach package (located on the [Village website](#)) is based on data pulled from the Multiple Listing Service (the system used by real estate agents to sell properties which tracks all transactions). Averages were calculated to demonstrate the appreciation rates of historical property values based on single-family homes sold. This historical data shows how the market behaved at the time that developments like Heart's Place were built and is a good indicator of what to expect when a new development like Grace Terrace is completed.

The data shows that property values are not negatively impacted when affordable housing developments are introduced into neighborhoods, which is also consistent with Full Circle's experience throughout its portfolio.

62. Why use Illinois state in your housing price increase comparison? Why not Arlington Heights or 60004 zip code?

The property values analysis provided made the comparison of the appreciation rate of single-family homes within a 1-mile of affordable housing developments and the appreciation rates of both the State of Illinois and the Village of Arlington Heights.

Please reference the response to questions #59 & 60 for additional information.

63. So according to the guy which he said housing value won't go down. You really think housing next to this building will maintain value? How?

The data from the property tax analysis included in the property values section of this Q&A show that property values for single-family homes near affordable housing developments are not negatively impacted by the development.

Please reference the response to questions #59 & 60 for additional information.

64. Do you have property valuation charts that are reflective of this neighborhood? \$500K and up?

Full Circle pulled data from the MLS for single-family homes sold within 1-mile of the proposed site from 2019-2023. We calculated the appreciation rate and compared it with that of homes sold within a 1-mile radius of Heart's Place and Linden Place. Please refer to questions #59 & 60 for more information on the property values of the homes surrounding the Grace Terrace site.

65. Property value analysis is completely invalid. Can you explain the process! Member of the Community has a proposal for statistically valid process.

Full Circle used historical data and calculated the percentage change rate over time to demonstrate the appreciation rates of the homes surrounding affordable housing developments. This is the same method the Federal Housing Finance Agency uses when analyzing home values throughout the country. Please refer to the Property Values Addendum located on the [Village website](#) for an explanation of how the data was collected and analyzed.

66. Can you [expand] on your statement regarding generating more property taxes with your proposal? How is that calculated?

Regarding Grace Terrace’s property tax estimation, we used the income approach formula to determine the fair market value of development and used the County’s tax calculation to determine the property tax amount.

Below are the property taxes⁷ for the currently vacant site for 2019 through 2022, which is the last full tax year available.

Tax Year	Vacant Site Property Taxes
2019	\$21,140
2020	\$26,615
2021	\$27,398
2022	\$29,592

Once the Grace Terrace development is completed, it will generate an estimated \$50,000+ annually in property taxes, which as demonstrated here, will add more to the tax base compared to its current vacant land status.

67. What are current property taxes collected on that vacant land?

Please see response to question #66.

68. When you Subcontract the village water main upgrade, Police dept, fire dept. School expense it would seem to lead a deficit. Do you have factual calculations that can back up upon statement the project would generate more property taxes?

Please refer to question #66 for more information on how property taxes are calculated and the estimation for Grace Terrace’s taxes. Please reference question #70 for the impact fee calculations.

⁷ [Cook County Treasurer’s Office](#). Property taxes for the Grace Terrace proposed site, 4/23/24.

69. You said this would “increase” tax plan but this property uses tax payer money. No? Meaning this so-called benefit means nothing.

The increase in taxes is referring to an increase in generation of taxes as compared to the current vacant land [please reference question #66].

The government funding that will be used to develop Grace Terrace are existing funding programs at the state and county level for the development of affordable housing. Therefore, the project will be a new increase in property tax revenue and not require any increase in taxes to pay for the development.

70. 75K impact fee is one time? Is the 50K in taxes a gross payment?

Impact fees are a one-time payment for new development projects. They are used to offset the cost of expanding or building new infrastructure for the development. The Village staff provided us with a standard document outlining the fee structure based on the building type, number of units, and unit type. Requiring impact fees is common across municipalities.

Regarding Grace Terrace’s property tax estimation, please refer to question #66.

71. Where did the \$75K in “fees” to the village come into play? When was that originally offered?

Impact fees are standard for any development and were not “offered.” They have always been a requirement as part of the development process. Please reference question #70 for an explanation of what the impact fee includes.

Crime & Safety/Security

72. Do you have the same security measures in all your other properties?

Safety and security are important at each of our properties and therefore we employ measures at each one. This includes strategically locating our management staff office to have sightlines into building entry points, exterior and interior security cameras which can be monitored remotely, controlled access with key fobs, and a monitored 24/7 tenant hotline for emergency requests.

The primary objectives of the security measures are to deter potential security threats, prevent lease violations and restrict access to unauthorized individuals. This system ensures that only residents and authorized personnel can access the site, maintaining a secure and well-regulated environment throughout the property.

73. I live 9/10 mile north of the Grace Terrae site, in Scarsedale. I love my neighborhood. I track the registered sex offenders list via the Family Watchdog site. There are 5 offenders scattered around me listed. There are none around the Grace Terrace neighborhood, making this neighborhood a unicorn.

Question: if you are screening for sex offenders, you will be able to keep this area safe? Because you would be able to control who moves in. If this area is open to regular home development- who knows who is moving in.

Per the House Rules, sex offender registrants are prohibited from living at the property. It is correct that our property will be more controlled with limiting who can qualify for tenancy as compared to most market-rate developments, single-family homes, or commercial uses.

74. Can you please explain how below policy [tenant selection plan] can control criminals! Full circle tenant selection plan shows that the owners ‘may’ but are not obligated to reject applicants with criminal convictions within last 10 years.

We have a rigorous criminal background check process and comply with the Cook County Just Housing Amendment to the Human Rights Ordinance, which allows us to screen candidates for criminal history that is less than three years old.⁸ Our criminal screening process is through a third-party and is based on data across all states for 47 different offense criteria. These screenings are point based, which means that certain crimes do not automatically exempt you from living at one of our properties, but if there are enough offenses (which would “score” against a candidate), that may disqualify someone. We are not intentionally using vague language- it is just a complicated process that does not easily translate into a simple narrative. We do reject applicants on the basis of property damage, drug offenses, sexual offenses and violent criminal offenses. We abide by all federal, state and county ordinances, including the Just Housing Amendment.

75. By using hearts place as a comparison, do you have any factual data of hearts place generating demand in law enforcement services? Can you publish that data?

Full Circle does not own/operate Heart’s Place. However, in the Village Staff Report for the 11/8/23 Plan Commission meeting, staff had coordinated with the Arlington Heights Police Department to inquire about the impact of an existing PSH located in the Village (Heart’s Place) and noted, “With the exception to a singular call for police service involving a firearm [please reference question #77 for more information on that incident], over the last five years Heart’s

⁸ https://www.cookcountyil.gov/sites/g/files/ywwepo161/files/documents/2024-01/jha_faq_for_landlords_updated_1.29.24%20%281%29.pdf

Place has not generated any additional demand on law enforcement services when compared to standard multi-family residential developments.”⁹

76. Is the CCTV system provided at Grace Terrace the same as the one that captured hearts place shooting on video?

We are not the owner or property manager of Heart’s Place, so we can’t speak to their CCTV system. Please see response to question #72 for a description of our security system that we’ve found to be effective at our properties.

77. Hearts Place is one of your developments. Shortly after opening there was a shooting. How are you preventing this from coming to my neighborhood?

Heart’s Place was not developed and is not owned by Full Circle. Our understanding of the incident is that a guest of a resident shot off a gun into the air (no one was injured) and the resident has since vacated the property, but again, Full Circle does not own or operate this property. As part of Full Circle’s lease requirements and house rules, no firearms will be allowed on the property.

78. Please tell us of any criminal activity at your places.

Not all of our properties are comparable to Grace Terrace and therefore would not provide for good comparisons when looking at crime rates. The Arlington Heights Police Department did their due diligence by calling Police Departments of jurisdictions with comparable PSH properties (including Full Circle properties) to determine the number of calls for service over the last three years and shared this information at the 12/4/23 Village Board meeting.¹⁰ In the Village Staff Report for the 11/8/23 Plan Commission meeting, staff had coordinated with the Arlington Heights Police Department to inquire about the impact of an existing PSH located in the Village (Heart’s Place) and noted, “With the exception to a singular call for police service involving a firearm [please reference question #77 for more information on that incident], over the last five years Heart’s Place has not generated any additional demand on law enforcement services when compared to standard multi-family residential developments.”¹¹ Please note that the number of police calls does not necessarily mean that it’s related to a resident that lives at

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<https://arlingtonheights.novusagenda.com/agendapublic/CoverSheet.aspx?ItemID=16168&MeetingID=3023>

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<https://cms2.revize.com/revize/arlington/Departments/Planning%20&%20Community%20Development/Developments%20&%20Projects/FCC%20Full%20Circle%20Communities/Staff%20VB%20Presentation%20-%20Grace%20Terrace%20Final.pdf>

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<https://arlingtonheights.novusagenda.com/agendapublic/CoverSheet.aspx?ItemID=16168&MeetingID=3023>

the property or that a crime has taken place; many service calls are for wellness checks for example.

The safety and security of our residents and staff, along with the surrounding community, is our highest priority. We foster strong relationships with first responders and have received letters of support or recommendation from many of the police departments where our properties are located. One such property is Creekview, a 25-unit senior living facility in Richmond, IL that Full Circle Communities developed in 2017. The Chief of Police of Richmond wrote a letter testifying, "I believe the Creekview community is an excellent addition to the Village of Richmond. The Village of Richmond Police Department prides itself on the close working relationship we have with our residents and community, and I am pleased to see that Creekview similarly places such a high level of importance on this as well."

In addition to fostering relationships with local first responders, residents are subject to a background check at initial occupancy [please reference question #74 for the background check process]. Due to our funding sources and the corresponding federal and state regulations, our tenants and properties are subject to a higher level of initial vetting than what is required for market-rate residential.

79. How were [name redacted], [name redacted] and [name redacted] allowed to take residency. How was [name redacted] allowed to take residency at Villagebrook?

The names have been redacted from the question for the privacy of our tenants (FOIA'd information typically redacts the addresses of individuals when providing criminal backgrounds; we do not want to supply the public with the names and addresses of our tenants, regardless of their background). We have no record of one of the names listed as being a tenant at any of our properties. For the remaining three tenants listed, at the time of screening the applicants' background checks, no disqualifying information was found. Please reference question #74 for an explanation of the criminal background screening process.

We have had examples of criminal activities on and off properties where the police have shared that information with us. If the criminal activity is a lease violation, we would pursue an eviction. If criminal activity happens offsite, and police do not make us aware of the activity, then our staff would have no way of knowing as we are not constantly screening our tenants. As landlord, we are responsible for maintaining the housing and quiet environment within the community; we are not an arm of law enforcement.

80. Why were the three individuals at McHenry County with Past Criminal background allowed to take & maintain residency?

Please see the response to question #79. Please note that there is no record of one of the individuals named in question #79 as living at Pearl Street Commons (our property in McHenry).

81. How was [name redacted] allowed to take residency in spite of Past Convictions!

Please see the response to question #79. The felony conviction of this resident along with their misdemeanors did not disqualify them from living at our property per the background check policy.

82. Since Villagebrook is not comparable to your proposed Grace Terrace, what is the difference between them? Who are allowed in these facilities?

Villagebrook is a multi-building apartment complex with 189 units consisting of 1-, 2- and 3-bedroom apartments located in an industrial area of Carol Stream, IL. Villagebrook was acquired by Full Circle in 2005 and originally built in 1979. Grace Terrace is a 25-unit proposed new construction supportive housing project targeting persons with disabilities and veterans with (20) 1-bedroom and (5) 2-bedroom apartments. The scale, target populations, location, and year built make these properties very different from each other.

83. Can you provide the specific incidence rates (police calls) for Pearl Street, 5150 NW Highway and Village Brook? Provide full composition and supporting detail.

The Village provided the number of calls for service for Pearl Street Commons (Full Circle property), Heart's Place (not owned or managed by Full Circle), Fifteenth Street Apartments (Full Circle property), Myer's Place (not owned and managed by Full Circle), 1212 Larkin (Full Circle property), and Philhaven (not owned and managed by Full Circle). The Village likely chose these properties because they are most comparable to the proposed Grace Terrace. Many of the properties average around two calls per unit per year, with the exception of Philhaven which averages more than three calls per unit per year.

5150 NW Highway and Villagebrook are not comparable to Grace Terrace. 5150 NW Highway is a 75-unit mixed-income apartment community located in Chicago. Villagebrook is a multi-building apartment complex with 189 1-, 2- and 3-bedroom apartments. Both of these buildings are significantly larger than Grace Terrace and have a different target population.

84. Provide Source data for incidence dates (emergency responses) at similar facilities. Hearts Place, Pearl Street & 5150 NW HWY

Please see response to question #83.

85. You mentioned criminal background checks- is it for all facilities? If it is, are they similar in process?

Criminal background checks vary by jurisdiction in terms of what we are able to check against and how far back we can go for background checks, but we do implement criminal background checks at all of our properties and the process is not different based on the populations of the

property (PSH vs. senior for example). Please reference question #74 for an explanation of our criminal background check process.

86. How far do you go back when screening for criminals background checks? What do you look for? Felony? Misdemeanor? What else?

Please reference question #74 for our criminal background check process. Due to the Cook County Just Housing Amendment to the Human Rights Ordinance, we are allowed to screen candidates for criminal history that is less than three years old.¹²

87. What kind of criminal charges if there's any do you allow for someone to live in the facility?

Please reference question #74 for our criminal background check process.

88. You claim the demand on law enforcement is no different than standard multifamily residential development- we currently have NONE, so that still represents at least a 30% increase. How do you not provide security?

In the Village Staff Report for the 11/8/23 Plan Commission meeting, staff had coordinated with the Arlington Heights Police Department to inquire about the impact of an existing PSH located in the Village (Heart's Place) and noted, "With the exception to a singular call for police service involving a firearm [please reference question #77 for more information on that incident], over the last five years Heart's Place has not generated any additional demand on law enforcement services when compared to standard multi-family residential developments."¹³ There are currently several multi-family residential developments in the area of the proposed site for Grace Terrace, including Linden Place, Park Place Condominiums, and the Gardens at Arlington Heights to the south of our property. We are also providing a robust security plan, as outlined in question #72.

89. What do you mean by you've seen reduction in emergency responses? Fire dept. Police? Can you provide factual data to back that up?

Full Circle maintains close collaborative relationships with local first responders. While we do not have crime data for operating properties we have acquired from before our acquisition, feedback and letters of support from emergency responders have demonstrated that our proactive management reduces the burden on first responders.

¹² https://www.cookcountyil.gov/sites/g/files/ywwepo161/files/documents/2024-01/jha_faq_for_landlords_updated_1.29.24%20%281%29.pdf

¹³

<https://arlingtonheights.novusagenda.com/agendapublic/CoverSheet.aspx?ItemID=16168&MeetingID=3023>

90. You do not find drug or alcohol abuse to be an issue in your facility? What does that mean? Does it mean because you know for a fact they do drugs on site? How do you decrease incidents?

Drug and alcohol abuse depends on the property and any issues are generally limited to only a few people across our portfolio, so by and large, we do not find drug or alcohol abuse to be an issue at our facilities. If it does become an issue, particularly if its interfering with other residents and/or the community, we would work with services staff to help reduce the incidents and property management staff to ensure any lease violations are investigated and handled appropriately, up to and including eviction. Drug use of any kind, including marijuana because this property is using federal sources, is a lease violation.

91. You can honestly attest all your residents in all your facilities have not dealt, produced + used drugs? You haven't had any incidents you needed to report on?

We have never attested to this. As mentioned in question #90, drug and alcohol abuse are limited to a few individuals at a few properties. Since these issues are limited to a small handful of residents, we generally handle them through our blended management approach (having services and property management work together to avoid displacing a resident). We are aware that there are a couple of residents at our properties historically that have been engaged in drug and/or alcohol abuse and those have been dealt with through lease enforcement and cooperation with first responders and our services team. It is also important to note that production or distribution of controlled substances results in a lifetime ban from government-funded housing.

92. Do you know about HB 5432? It will ban all local crime free housing ordinance in Illinois. How will you handle crimes of tenants when this is banned?

This bill (which is unlikely to move ahead) would prohibit municipalities from creating or enforcing crime free ordinances; it does not change management screening.

93. Does Arlington Heights require a crime free housing addendum with lease?

Arlington Heights does not require a crime-free housing addendum with leases. Our lease does have a clause that prohibits the following conduct: "behaving in a loud or obnoxious manner; disturbing or threatening the rights, comfort, health, safety, or convenience of others (including our agents and employees) in or near the apartment community; disrupting our business operations; manufacturing, delivering, possessing with intent to deliver, or otherwise possessing a controlled substance or drug paraphernalia; engaging in or threatening violence; possessing a weapon prohibited by state law; discharging a firearm in the apartment community; displaying or possessing a gun, knife, or other weapon in the common area in a way that may disturb other people... You are responsible for the conduct of your occupants and

guests. You nor any people living with you or visiting you shall have been convicted of a crime relating to illegal sexual conduct nor shall be a registered sex offender in any state.” Violations to the above would be considered a lease violation and would be cause for eviction.

Privacy Concerns

94. What about the concerns of the neighbors on the west side?

While the east side of the Grace Terrace property has a fence and landscape buffer, the west side is buffered by the parking lot and Arlington Heights Rd itself. Our other safety and security measures such as on-site staffing and security cameras apply to the entire site.

95. Buffer/Fencing

There will be a 6’ tall solid privacy fence installed along the perimeter of the property adjacent to the neighbors to the east. We are also installing robust and layered landscaping that includes a staggered evergreen barrier, in addition to existing mature trees, to create a buffer between the building and the east property line that ranges in depth from 74’ to 102’. This is in addition to the distance of the rear neighbor to their west property line, which is approximately 32’, for a total building to building distance of approximately 134’. By comparison, this distance far exceeds the 40’ average distance between the homes immediately to the east. This also exceeds the average distance of homes that face each other on Emerson Street, which is about 126’.

96. How do you ensure people in the community from not encroaching onto other homeowners’ properties and there is a clear designation of space?

Our site is bounded by a busy road with no crosswalks on the west and extensive landscaping and fencing on the east [please reference question #95 for the landscape and fence buffer]. There will be no physical encroachment of our property onto neighboring properties.

Design & Accessibility

97. What green measures are being taken?

The project is designed to achieve Enterprise Green Communities and Energy Star Certifications, which include the following measures that exceed code requirements:

- 3-story construction which reduces the building footprint, maximizing permeable surface area and minimizing exterior wall and roof areas, which reduces heating and cooling energy requirements over the same size 2-story building
- Electric heat pump HVAC systems, which reduce carbon emissions and are more efficient than the code requires in both heating and cooling modes
- Continuous ventilation using Energy Star bathroom exhaust fans
- Energy Star (ES) certified or LED interior light fixtures with occupancy sensor control in all common spaces
- ES certified refrigerators and washing machines (ES doesn't certify other appliance types)
- Low-flow plumbing fixtures, including ultra-low flush (0.8 gallons per flush) toilets
- ES certified highly reflective membrane roofing on the flat roof
- ES certified vinyl windows which are substantially more efficient than required by the code
- Air-sealing measures that exceed the code requirement and are 3rd-party verified by blower door testing
- Native and drought-tolerant landscaping to the extent permitted by the Village Landscape Ordinance

98. ADA specific units, why not all units? Given that this is proposed for disabled individuals and vets?

We will meet the minimum number of required Type A ADA units. 10% of the units will be Accessible (Type A) and 20% of units will be Adaptable and the rest will be Type B (which will not have accessibility features installed but will have universal design features). Since the property will be disability neutral, there are not 'one-size-fits-all' features that address every disability, so we try to offer a range of units that can accommodate our population.

Accessible/ADA units will feature lower counter heights, shallow shelves, roll-under sinks and prep spaces, and rocker switches and outlets will be provided in accessible units. Some bathrooms will also feature roll-in showers.