

March 2012

# NAS-JRB Willow Grove Homeless Assistance Submission



Prepared for:



**Horsham Township Authority for  
NAS-JRB Willow Grove**

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# **HOMELESS ASSISTANCE SUBMISSION**

## **A. INTRODUCTION**

The Horsham Township Authority for NAS-JRB Willow Grove (HLRA), the OEA recognized planning LRA leading the NAS-JRB Willow Grove redevelopment planning process, is submitting the following document to the Department of Housing and Urban Development (HUD) in support of its approval of the attached base reuse master plan. The Reuse Master Plan seeks to balance the needs of the region's homeless population, with the long-term needs of the community to create a high quality employment center and mixed-use community. The reuse master plan must also present a fiscally prudent redevelopment approach that focuses on job creation, housing, transportation improvements and preservation of open space and recreational opportunities.

The following report describes the NAS-JRB Willow Grove property and the reuse planning effort that the HLRA has undertaken. Also included is a description of the homeless population in Montgomery and Bucks counties and the services that are available through a variety of providers and agencies. The report concludes with a summary of how the HLRA and the Horsham community propose to balance of the needs of the homeless with the regional economic development and other public needs expressed by the community through the redevelopment planning process.

## **B. HORSHAM TOWNSHIP AUTHORITY FOR NAS-JRB WILLOW GROVE (HLRA)**

### **1. Creation of Planning LRA**

In preparation for the closure of NAS-JRB Willow Grove, The Horsham Township Authority for NAS-JRB (HLRA) was formed by Horsham Township Resolution 2005-26 on October 12, 2005 to oversee and facilitate the creation of a Redevelopment Plan. The HLRA, Horsham Township Authority for NAS-JRB (Naval Air Station Joint Reserve Base) is a corporation established on November 7, 2005 under the authority of the Pennsylvania Authorities Act. The HLRA is located in the Horsham Township Municipal Building at 1025 Horsham Road, Horsham, PA 19044. The articles of Incorporation were filed with the Secretary of the Commonwealth of Pennsylvania on November 23, 2005.

The Authority was created with a seven member Board but in early 2006, Horsham Township Council adopted an ordinance resulting in the Authority's Board being expanded to nine members. The Boards membership included a broad representation of affected municipalities and entities to include local and county elected officials, representatives from the local business community, the county's Industrial Development Corporation, the local school district and a local resident. In addition to the Executive Board, there are five subcommittees including Reuse Planning, Economic Development, Environmental, Housing and Homeless and the Bucks County Housing committees.

The HLRA was designated by Department of Defense's Office of Economic Adjustment (OEA) as the

legally recognized Local Redevelopment Authority (LRA) on March 10, 2006.

## 2. Property Surplus Decision Timeline

In 2005, the decision was made by Base Realignment and Closure (BRAC) to close NAS-JRB Willow Grove. By federal statute, NAS-JRB Willow Grove was to have been declared surplus in June 2006. However, there was a delay in the closure process, and it was not until September 16, 2010 that the Navy issued a declaration of surplus property for the current property. This was the first official listing of the NAS-JRB property that the federal government would be declaring surplus under BRAC 2005.



This delay was initiated through the passing of special legislation at the request of former Pennsylvania Governor Rendell, to allow for the creation of a Joint Interagency Installation (JII). However, in November 2009, the Governor was forced to withdraw support for the proposed installation, which would have been the nation's only state-operated base to provide national defense, homeland security, and emergency preparedness operations. With state revenues contracting due to the severe economic recession of 2009, the Governor informed the U.S. Secretary of Defense that the Commonwealth would not be taking ownership or title of the installation and suggested the property be retained by the Department of Defense. This decision terminated the Joint Interagency Installation, which resulted in the base being re-declared surplus property under BRAC. In addition, approximately 205 acres of surplus property was ultimately transferred to the U.S. Air Force for a joint reserve base at the far northeast portion of the property.

Prior to Governor Rendell's decision on the Joint Interagency Installation (JII) and the final declaration of surplus in September 2010, the HLRA was involved in two other BRAC 2005 actions. The first one, in May 2006, involved the Horsham Memorial U.S. Army Reserve Center on Easton Road in Horsham, PA. There were no Notices of Interest (NOI) submitted by qualified homeless service providers for the property associated with the Horsham Memorial U.S. Army Reserve Center. The approved Horsham Memorial USARC Reuse Plan (July 2007) calls for the property to be conveyed to the Hatboro-Horsham School District via a public benefit conveyance through the U.S. Department of Education. The second surplus property declaration in January 2009 involved the NAS-JRB Willow Grove off-site housing in Bucks County, PA. The NAS-JRB Willow Grove off-site housing consisted of two non-contiguous land parcels. The approved Redevelopment Plan and Homeless Assistance Submission for the NAS-JRB Willow Grove Off-Site Housing includes a 2.54 acre parcel in Ivyland Borough to be conveyed to the Bucks County Housing Group and a portion of the Shenandoah Woods Housing Area to the Aldie Foundation via a homeless assistance conveyances. A portion of the off-base housing area will be conveyed to Warminster Township via a public benefit conveyance through the U.S. Department of the Interior with the remainder to be sold via a negotiated sale with the Bucks County Redevelopment Authority.

## **C. OUTREACH TO HOMELESS SERVICE PROVIDERS**

### **1. Public Notice**

As required by law, a formal Notice of Availability of Surplus Federal Property to State and Local Eligible Parties, including Homeless Service Providers was published by the HLRA on October 15, 2010 in the Courier Times and Intelligencer, the largest circulation newspapers for Montgomery and Bucks Counties. In addition, notices were published in the Pottstown Mercury and the Reporter. A copy of the advertisements is included in Attachment A of the Attachment Section. The advertisements and supporting documentation indicated that a workshop would be held on December 16, 2010. The public notice solicited the interest of local public agencies and nonprofit organizations/institutions in the submission of notices of interest (NOI) for portions of the surplus property known as NAS-JRB Willow Grove.

### **2. Direct Outreach to Homeless Service Providers**

Outreach to area homeless service providers, as well as potential Public Benefit Conveyance (PBC) recipients, was provided through a combination of public notice postings, public informational meeting and personal tours of the surplus property. The list of area providers that were contacted, via certified mail, was obtained from the local HUD regional field office and included (Attachment B and C):

- American Red Cross, Lower Bucks Chapter
- Bucks County Department of Community & Business Development
- Bucks County Housing Authority
- Bucks County Housing Group
- Bucks County Office of Employment & Training
- Community Action Dev. Commission-Montgomery County
- Community Housing Services, Inc.
- Family Services of Montgomery County
- Hedwig House
- Indian Valley Opportunity Center
- Keystone Opportunity Center
- Laurel House
- Mental Health Association of Southeastern PA
- Montgomery County Department of Housing/Community Development
- Montgomery County Mental Health Program
- Penn Foundation
- Penn del M/H Center, Inc.
- Salvation Army Norristown
- Salvation Army Pottstown

### **3. Other Organizations**

Additional organizations contacted via certified mail:

- Montgomery County - Office of Commissioners
- Bucks County - Office of Commissioners
- Governor, Commonwealth of Pennsylvania

#### **4. Governmental Jurisdictions Involved in the Redevelopment Plan and Homeless Assistance Submission**

The following governmental jurisdictions were involved:

- Horsham Township, PA
- Bucks County, PA
- Montgomery County, PA

#### **5. Informational Meeting**

On December 16, 2010, the aforementioned public informational meeting was held at the Horsham Township Community Center. This meeting was attended by 40-50 members of the community, including a number of homeless providers and other social service advocates. The list of attendees is illustrated on the sign-in sheets in Attachment D.

A *BRAC 05 LRA Outreach Process* presentation was given at the public informational meeting that addressed the following topics and points of information (Attachment E):

- Summary of BRAC 05 Process and Planning
- HLRA's Role
- Public Outreach
- Redevelopment Plan
- Department of Defense
- Public Benefit Conveyance Guidance
- Surplus Property Background
- Environmental
- Utilities

Attendees of the informational session were provided with a Notice of Interest (NOI) Application Packet for Homeless Service Providers and Public Benefit Users. This packet contained the following items.

1. NOI Instructions
2. Declaration of Surplus Property
3. OEA Letter of Recognition for HLRA
4. HLRA NOI Solicitation
5. Contact Information
6. HUD Guidelines
7. Public Benefit Conveyance
8. Property Data
9. Environmental Condition of Property
10. Personal Property Inventory

Led by HLRA Executive Director Michael McGee, the group then departed for an hour-long bus tour of the NAS-JRB Willow Grove property. Roughly 50 people toured the base and were able to view the facilities up close and to get a sense for the layout of the property. The attendees represented numerous public agencies and non-profit organizations. The deadline for proposal submission was announced as March 22, 2011 (Attachment E).

## **6. Description of Outreach Efforts**

NAS-JRB Willow Grove was a vital part of the Horsham community for over six decades and its closing will have a profound impact on the region, as will its redevelopment over the coming decades. In 2011, the HLRA spent the year conducting a massive public outreach campaign to hear comments, suggestions and opinions about the reuse of the base from a broad spectrum of residents, business owners and local and regional stakeholders. The community responded with hundreds of comment cards, emails, and letters.

The following initiatives were implemented to ensure a transparent process:

- Publicly-announced monthly meetings
- HLRA Website (updated daily)
- E-news alerts (volunteer sign up to receive meeting notices, agendas, meeting minutes, etc.)
- Branding/Image Development
- Media Relations
- Articles and editorials in the local newspapers
- Meeting overview on Horsham Township government access TV channel
- Community and business group presentations
- HLRA Outreach Office
- Outreach Workshop
- Community Design Charrette
- Public Forum for Base Reuse Alternatives

The HLRA has ensured that its process to generate the NAS-JRB Willow Grove Redevelopment Plan and Homeless Assistance Submission has been a transparent process in which input from the general public and affected parties is fully considered. Each of the communication and outreach strategies listed above has been instrumental in the development of the NAS-JRB Willow Grove Redevelopment Plan.

## **D. HOMELESS POPULATION WITHIN THE VICINITY OF NAS-JRB WILLOW GROVE**

NAS-JRB Willow Grove is located in Horsham Township in Montgomery County, Pennsylvania. However, the site borders the Bucks County line to the east. Due to its location, the NAS-JRB Willow Grove property is considered to be in the vicinity of both Montgomery County and Bucks County. There are currently 61 nonprofit social service organizations and government agencies that participate in the Montgomery County Continuum of Care (CoC) process. Bucks County contains 48 such agencies. These agencies provide a variety of services to the homeless community, and represent a wide array of institutions, agencies, private companies, faith-based organizations and homeless clients.

### **1. Estimated Size of Homeless Population**

The Point-in-Time (PIT) count of the homeless population is a one-day, statistically reliable, unduplicated count of sheltered and unsheltered homeless individuals and families in Montgomery and Bucks counties. Conducting a PIT count is required by HUD, which provides a tally of who is homeless on a given night as well as a snapshot of who experiences homelessness throughout the year. This count helps determine how well existing services are meeting demand and also provides a basis for securing local, state, federal and other private funding sources.



The most recent PIT count for Montgomery County was conducted by the Montgomery County Continuum of Care on January 27, 2010. A total of 428 family members and individuals were identified as experiencing homelessness either in the County's emergency shelters, transitional housing, or they were classified as unsheltered. Of these, 60.3% (258) were family households, 36.9% (158) were single individuals and 2.8% (12) were living in households with only children. The point in time count for Bucks County indicated that on January 28, 2010 there were 474 total people identified as homeless. Of this total, 64.3% (305 people) were in family households and 35.7% (169 people) were classified as individuals.

The two counties had a combined total of 902 individuals identified as homeless on the nights of January 27 and 28, 2010. Approximately 62.5% (563) were in family households, 36.2% (327) were single individuals, and 1.3% (12) was living in households with only children.

## 2. Homeless Facilities

The data on homeless facilities and needs for Montgomery County was obtained from the Montgomery County 2010-2014 Consolidated Plan. The facility inventory for Bucks County was provided by the Bucks County Consolidated Plan 2009-2014. However, the Bucks County plan does not state the housing needs in terms of numbers of beds or units. As such, the homeless housing needs for Bucks County were obtained from the report, *Homelessness in Montgomery and Bucks Counties: An Assessment of Conditions, Resources and Programmatic Needs*, prepared by Diana T. Myers and Associates.

- **Emergency Shelter Beds** - According to the Montgomery County 2010-2014 Consolidated Plan, there are currently 195 year-round beds. There are 23 provided for households with children and 77 provided for households without children. The report indicates that there is no need for additional emergency shelter beds in Montgomery County.

In Bucks County, there are 99 year-round emergency shelter beds. There are 81 family beds and 18 individual beds. Information provided in the Myers report indicates there is a need for 75 additional beds, including 15 family beds and 60 individual beds.

- **Transitional Housing** - Montgomery County has 11 transitional housing developments containing 232 beds for households with children, and an additional 34 beds for single adults. The report indicates no additional need for transitional housing in Montgomery County.

Bucks County Housing Group reports 433 transitional housing beds exist in Bucks County, 314 beds are for families and 119 are for individuals). There is an estimated need for 57 beds for individuals.

- **Permanent Housing** - There are ten permanent housing developments owned and operated by four organizations that are located in Montgomery County. Together they provide 155 permanent housing beds for families and individuals. Fifty-eight of the beds (37.4%) are targeted for the chronically homeless. In addition to housing, services are a part of the living arrangement for the tenants.

The Montgomery County Consolidated Plan states there is a need for a total of 148 permanent housing beds, of which 68 would be for households with children and 80 for households without children. It should be noted that the Plan states the 68 beds for households with children translates to a need of 21 units. The Consolidated Plan does not

state the number of units needed for households without children.

The Bucks County Consolidated Plan 2009-2014 reported there are 44 permanent supportive housing beds (all of which are individual or chronically homeless beds). The Myers report states a need for 20 additional units for individuals with disabilities. The Myers report uses the terms “beds” and “units” interchangeably.

- **Safe Haven** – PA Housing Choices, a website sponsored by the PA Department of Public Welfare, describes Safe Haven as a form of (transitional or permanent) supportive housing that strives to reach homeless persons who have severe mental illness, provides 24-hour residence for an unspecified duration, provides private or semi-private accommodations and has overnight occupancy limited to 25 persons. This type of housing is commonly referred to as “low-demand” as individuals with addictions come directly from the street and are required to stay clean and sober, and participate in treatment programs. The Consolidated Plan indicates a need for 25 Safe Haven beds in Montgomery County. No Safe Haven beds are reported to be needed in Bucks County.

In total, there is an unmet need of 75 emergency shelter beds, 57 transitional housing beds, and 168 permanent housing beds in both counties (Table 1). It should be noted that these totals reflect the number of beds, and not housing units, that are needed. The report, *Homelessness in Montgomery and Bucks Counties: An Assessment of Conditions, Resources and Programmatic Needs*, prepared by Diana T. Myers and Associates, reports that **there is a need for over 123 permanent supportive housing units in both counties, not including doubled-up households**. However, that number assumes the need for 82 beds for those without children would all need to be in separate units. It should also be noted the Montgomery County Consolidated Plan states a need for 80 permanent beds for households without children, while the Myers report states a need for 82 “beds/units”.

**Table 1**  
**Homeless Facility Needs**  
**Montgomery and Bucks Counties**

County	Number of Beds				Total
	Emergency Shelter	Transitional Housing	Permanent Housing	Safe Haven	
<b>Consolidated Plan - Homeless Housing</b>					
Montgomery County - Consolidated Plan	0	0	148	25	173
Bucks County - Consolidated Plan [1]	n/a	n/a	n/a	n/a	n/a
<b>Myers Report - Homeless Housing</b>					
Montgomery County - Consolidated Plan	0	0	148	25	173
Bucks County - Myers Report	75	57	20	0	152
<b>Total</b>	<b>75</b>	<b>57</b>	<b>168</b>	<b>25</b>	<b>325</b>

Source: 2010-2014 Montgomery County Consolidated Plan, Myers Report, and RKG Associates, Inc., 2011

Note: [1] - Consolidated plan did not provide estimate of homeless housing units/beds

## **E. NOTICES OF INTEREST**

### **1. Public Benefit Conveyance Outreach and HLRA Decisions**

Outreach to interested parties considering a PBC of surplus properties operated concurrently with outreach to homeless providers. The public information meeting on December 16, 2010 also served to inform potential PBC applicants about the surplus property's characteristics, as well as the procedural requirements for submitting a NOI.

Entities interested in obtaining property through a Public Benefit Conveyance ("PBC"), other than a homeless assistance conveyance, were invited to contact the following Federal agency offices to find out more about each agency's PBC program and to discuss with the agency the entity's potential for qualifying for a conveyance of property. Federal agencies sponsoring PBC's include the Department of the Interior for parks, recreation, wildlife conservation, lighthouses, and historic monuments uses; the Department of Education for educational uses; the Department of Health and Human Services for public health uses; the Department of Justice for correctional facilities and law enforcement uses; the Department of Housing and Urban Development for Self-Help Programs; the Department of Transportation for seaports; the Veterans Administration for cemeteries; and the Federal Emergency Management Agency for emergency management purposes. A complete listing of the Federal agencies with the PBC programs with specific points of contact was made available in the NOI packet (Attachment F).

NOIs for PBCs must include: (i) a description of the eligibility for the proposed transfer, (ii) the proposed use of the property, including a description of the buildings and property necessary to carry out such proposed use, (iii) time frame for occupation, and (iv) the benefit to the community from such proposed use, including the number of jobs the use would generate.

Seventeen NOI applications were received by the HLRA on March 22, 2011. The NOIs received were as follows:

- ATG Learning Academy (education)
- Acts Retirement Communities (continuing care community)
- America Responds with Love (various)
- Horsham Township (parks and open space)
- Horsham Township (public safety building)
- Horsham Township (roads)
- ESI Equipment (public safety)
- Hatboro-Horsham School District (school)
- Horsham Water and Sewer Authority (utilities)
- Philadelphia Stand Down (homeless veterans)
- Philadelphia Search and Rescue (public safety)
- YMCA (day care/summer camp)
- Play and Learn (childcare/early education)
- Montgomery County (airport)
- Montgomery County (park)
- on behalf of Delaware Valley historic Aviation Association (aviation museum)
- Bucks County Airport Authority (airport)

## 2. Homeless Service Provider NOIs

Of the 17 NOI's that were received by the March 22, 2011 deadline, three were received from homeless service providers, or from organizations seeking to provide services to the homeless through their programs. The homeless service proposals included: (1) Bucks County Housing Group, with partners Genesis Housing Corporation and TRF Development Partners (here-in referred to as Bucks County Housing Group et al.), (2) Philadelphia Stand Down, and (3) America Responds with Love.

With the assistance of RKG Associates, Inc. and Kutak Rock, the HLRA's BRAC legal counsel, the HLRA evaluated all 17 submissions (Attachment G). Follow-up letters were submitted to each NOI applicant on May 25, 2011 seeking additional information and further clarification (Attachment H). These requests for additional information were sent to all applicants with a submission deadline of June 15, 2011.

During the course of the planning and outreach process, **America Responds with Love** did not respond to the HLRA's request for additional information and their NOI submission was judged incomplete. The organization notified the HLRA staff by phone that they were no longer interested in obtaining the property for homeless purposes. The **Philadelphia Stand Down** organization also did not submit all the additional information requested by the HLRA and their NOI was judged to be incomplete. The remaining homeless services provider, **Bucks County Housing Group et al.**, has remained engaged and interested throughout the planning process and submitted all information about their proposed housing development costs and operating assumptions as requested (Attachment I).

On July 27, 2011 a public meeting of the HLRA Board was held to discuss and to take formal action on all 17 NOI applications (Table 2). The meeting at the Horsham Township Community Center was attended by the HLRA Board, members of the general public and some NOI applicants. RKG Associates publicly presented its evaluation and recommendations for all 17 applications including the three homeless service submissions. The HLRA Board recommended that the *Bucks County Housing Group et al.* be included in the redevelopment plan alternatives, with the final site location, development size and method of conveyance to be determined by the HLRA Board at a later date. Formal letters summarizing the HLRA Board's decision were mailed to each applicant on August 4, 2011 (Attachment J).

**Table 2**  
**HLRA Board Actions - NOI Submissions**  
**NAS-JRB Willow Grove**

NOI Applicant	HLRA Board Action (7-27-11)		
	Direct the consultants not to include the application in preparation of the various redevelopment scenarios	Direct the consultants to further study and attempt to include the application as they prepare the various redevelopment scenarios *	Direct the consultants to further study and attempt to include the application as they prepare the various redevelopment scenarios, however without a no or low cost PBC and not incorporate the application in the redevelopment scenarios
America Responds with Love	X		
Philadelphia Stand Down	X		
Bucks County Housing Group		X	
Montgomery County	X		
Bucks County Airport Authority	X		
Horsham Township Parks & Recreation		X (See Note 1)	
Horsham Township Firehouse		X	
Horsham Township Easements & Roads		X	
Hatboro-Horsham School District		X	
Horsham Water & Sewer Authority		X	
DVHAA		X	
YMCA of Philadelphia	X		
Acts Retirement-Life Communities, Inc.			X
ESI Equipment, Inc.	X		
Greater Philadelphia Search and Rescue			X
ATG Learning Academy			X
Play & Learn			X

Notes:

\* Location, size and method of conveyance will be determined at a later time.

1. The Board specifically directed that the parcel where the old Horsham Elementary School was located (east of Rt 611) be included in the Parks/Open Space plan.

After several months of review and an opportunity for each applicant to submit additional information, the HLRA Board made the following decisions.

- **Bucks County Housing Group, Genesis Housing Corporation, and TRF Development Partners (BCHG)**

The HLRA received a Notice of Interest (NOI) from Bucks County Housing Group (BCHG) and partners Genesis Housing Corporation and TRF Development Partners on March 22, 2011. BCHG is a private, non-profit social service organization which provides a wide range of housing and related social services to homeless and low income families. The primary goal of BCHG is to assist families attain permanent housing and financial stability.

The BCHG submitted their NOI in partnership with Genesis Housing Corporation, a non-profit organization that has served as a community housing development organization in Montgomery County since 1994. BCHG also partnered with TRF Development Partners, a regional nonprofit housing developer.

The proposed program for NAS-JRB Willow Grove was designed to create permanent supportive housing for McKinney/HEARTH eligible homeless families and individuals in Bucks and Montgomery County. The developers will seek to provide social services and housing specifically designed to assist homeless veterans. In total, the Bucks County Housing Group et

al proposed that 105 units be created on three separate parcels. These units would provide permanent supportive housing for 34 families (including 85 residents) and 71 individuals. The request also included office space for administration and supportive services. The initial application was considered generally complete and the additional information provided by Bucks County Housing Group et al. responded to the HLRA's requests (Attachment K).

a.) Site #1 – 3 Columbia Avenue

A total of 30 units are proposed on this site. The developers are proposing 30 detached units of permanent rental housing for McKinney/HEARTH eligible individuals and households.

b.) Site #2 – Navy Lodge Facilities 109, 110, 111, 112, 660, 605, 131, and 132, Navy Exchange, and Quarters B-F

This site includes the reuse and conversion of the Navy Lodge into a 30-unit apartment building that includes 1- and 2-bedroom apartments; 2) the rehabilitation of Quarters B-F to support the permanent housing needs of five families with children; 3) the reuse and conversion of the Navy Exchange into office space for property management and social services connected with the entire homeless reuse at all three properties.

c.) Site #3 – Northwestern Corner of Maple Avenue and Easton Road

There are 20 duplex units proposed at this site.

NOI Evaluation: The NOI request was judged substantially complete and demonstrated the applicant's understanding of the project and the requirements for implementation. Given the experience of the BCHG participants, the NOI application was accepted as substantially complete.

HLRA Decision: The HLRA Board approved a motion to include the NOI in the three redevelopment plan alternatives, with the final site location, development size and method of conveyance to be determined by the reuse planning team and the HLRA board at a later date.

▪ **Philadelphia Stand Down (PSD)**

The applicant (PSD) is a non-profit organization that provides services to the homeless veteran population in the greater Philadelphia area. Its primary services involve an annual three-day event where social service organizations come together to provide services and assistance to homeless and other veterans including meals, health care, referrals and assessments. The annual event serves 200-300 veterans each year and has an annual operating budget of approximately \$56,000.

PSD does not directly provide housing for the homeless; rather it serves as an important referral network throughout the year. The organization sought several properties at NAS-JRB Willow Grove, including (Attachment L):

- Buildings 43 and 22 for use as a storage facility for the annual PSD event,
- Building 172 (BEQ) for transient housing for homeless veterans,
- Building 605 (Navy Lodge) for offices for the organization and for a Veteran's Administration medical center,
- Building 601 (Reserves) for use as a 30 bed drug and alcohol detox center,
- Building 140 (Training Facility) for use as a training and education center in collaboration with area technical schools and community colleges,

- Building 635 as a motor pool and technical training program location, and
- Building 118 and the antennae farm complex for use as a facilities maintenance and supply center.

In response to the HLRA's letter requesting additional information, the applicant replied by e-mail indicating that it was attempting to meet with several prospective funding agencies and service delivery partners. It also included an estimate of the rehabilitation costs for the requested buildings that exceeded \$26 million, indicating it would be seeking loans for a portion of this cost (Attachment H). No specific operational or organizational details were provided. In addition, PSD did not demonstrate that it had contacted any potential federal sponsor as was requested by the HLRA.

NOI Evaluation: The applicant did not provide all the information requested by the HLRA and the NOI application was judged substantially incomplete. The size of the request and the complexity of the proposed services to be provided appeared to exceed the capabilities of the organization, based on its history and the information provided.

HLRA Decision: The HLRA Board formally denied the applicant's NOI request.

▪ **America Responds with Love (ARL)**

America Responds with Love is a national non-profit organization, headquartered in Wichita, Kansas, that provides a range of charitable services throughout the country. The NOI request from ARL sought three separate properties through a public benefit conveyance.

- The donation of up to 20,000 square feet of storage facilities for products donated to the organization prior to distribution to needy families and individuals,
- Between 5 and 15 acres of land on which to grow flowers and bulbs, and
- Fee ownership of 10 acres of land on which to build up to 40 single-family, owner occupied units of affordable housing for handicapped veterans and other handicapped people in need.

The applicant did not respond in writing to the HLRA's request for additional information, but a representative of ARL called the HLRA staff to inform them that he was not going to formally respond to the request for additional information, but was still interested in using portions of the base to plant flowers. He also indicated that if vacant buildings were available, he had a pool of qualified individuals to do restoration work (Attachment M).

NOI Evaluation: Based on the lack of information and the applicant's request to be removed from further PBC consideration, the NOI application was judged to be incomplete.

HLRA Decision: HLRA Board formally denied the applicant's NOI request.

## **F. OUTREACH MEETINGS AND PUBLIC COMMENT**

Another aspect of the public outreach effort included the Horsham Township Authority's monthly and other special planning meetings. Not only were these meetings open to the public, as required by law, but at each meeting, members of the public were provided the opportunity to make comments or ask questions of the HLRA board members and/or staff. Meeting agendas and minutes were made available to the public throughout the project duration. Copies of all HLRA board minutes and are available online at [www.hlra.org/meeting](http://www.hlra.org/meeting) minutes and agendas. As a matter of routine all interested parties are permitted and encouraged to provide comment on all matters to come before

the Board. Thus there is no distinction between a hearing and a meeting.

December 16, 2010	HLRA Workshop and Base Tour
January 19, 2011	HLRA Executive Board Meeting
February 7, 2011	Kick-off Meeting
March 16, 2011	HLRA Executive Board Meeting
April 20, 2011	Existing Conditions Presentation
May 18, 2011	HLRA Executive Board Meeting
June 10, 2011	Community Design Charrette (session 1)
June 10, 2011	Community Design Charrette (session 2)
June 11, 2011	Open Public Viewing
June 15, 2011	HLRA Executive Board Meeting
July 27, 2011	Presentation and HLRA Directives on NOI's
August 17, 2011	Presentation of Base Reuse Alternatives
September 21, 2011	HLRA Executive Board Meeting
October 19, 2011	Presentation of Reuse Plan Refinement
November 16, 2011	Presentation of Preferred Reuse Alternative-Option D
December 21, 2011	HLRA Executive Board Meeting
January 18, 2012	Presentation of Preferred Reuse Alternative-Option E
February 15, 2012	HLRA Executive Board Meeting – Final Redevelopment Plan
March 21, 2012	Final Redevelopment Plan Adoption

## **G. BALANCE DETERMINATION**

### **1. Estimated Permanent Supportive Housing Need**

Under BRAC and HUD regulations, the HLRA must balance the social and economic development needs of the community with the needs of the homeless in determining the redevelopment of the NAS-JRB Willow Grove property. The information from the Myers report cited above indicates a need for 123 permanent housing units in both Bucks and Montgomery counties. The NOI application submitted by the Bucks County Housing Group et al proposes that 105 of these units be located at the NAS-JRB Willow Grove property. The 105 units amount to approximately 85% of the combined identified need for said housing in Bucks County (20 units) and Montgomery County (103 units), as identified in the latest HUD approved Continuum of Care documentation.

### **2. Competing Interests for NAS-JRB Willow Grove**

As shown in Table 2, the NOI requests for total land acreage at NAS-JRB Willow Grove equaled 188% of the estimated total of 862 acres. These requests were then balanced against the full range of future uses desired by the Horsham community. During the reuse planning process numerous adjustments in the land plan were made to reach a compromise between the interests of the community and those of individual organizations.



**Table 2**  
**Total Requested Land Acres - NAS-JRB Willow Grove**  
**NOI Requests**

Submitting Organization	Acres Requested	Desired Use
Montgomery County	540	Public general aviation airport
Hatboro-Horsham School District	60	Future educational needs to enhance services provided and replace aging and/or inadequate facilities
Montgomery County on behalf of Delaware Valley Historical Aircraft Association	52	Move and expand existing aviation museum and park
Horsham Township	2	Fire station and Emergency preparedness office
Horsham Township	128	Parks and recreation
YMCA of Philadelphia & Vicinity	40	Child care center and summer day camp
Bucks County Aviation Authority	682	Public airport and business aviation center
America Responds with Love, Inc.	15	2 – agriculture (flower growing)
	10	3 - to build 40± residential units for handicapped veterans and others
Bucks County Housing Group w/Genesis Housing Corporation and TRF Development	Unknown	To develop 105 units of permanent supportive housing (under McKinney/HEARTH programs)
ESI Equipment, Inc.	10	National training and research center
ACTS Retirement-Life Communities Inc.	80	300-350 independent living units (2-3 story garden style apts), 40-60 assisted living units, 60 skilled care beds
Play and Learn, Inc.	5	Early childhood education and daycare center for ~150 children
<b>Total Requested Acreage</b>	1623	

Source: NOI Applications and RKG Associates, Inc., 2012

### 3. NOI Land Allocation Decisions

The NOI land allocation process was part of an iterative planning process, which inevitably resulted in the allocation of 862 acres. Invariably, the planning process was not able to fulfill all the requests from the organizations submitting NOIs. Table 3 shows how the NOI land requests were balanced in the Preferred Reuse Plan. The Bucks County Housing Group’s NOI request included three parcels of unknown acreage. Like other competing uses, the HLRA has weighted the community’s economic development goals for job creation and increased tax base and has limited the number of acres and housing units dedicated to this use.

**Table 3**  
**Total Requested Land Acres - NAS-JRB Willow Grove**  
**NOI Requests**

<b>Submitting Organization</b>	<b>Acres Requested</b>	<b>Acres Allocated</b>
Montgomery County (Runway & Facilities)	540	N/A
Hatboro-Horsham School District	60	40
Montgomery County on behalf of DVHAA	52	13.1
Horsham Township	2	2
Horsham Township (Recreation & Open Space)	128	205
YMCA of Philadelphia & Vicinity	40	N/A
Bucks County Aviation Authority (Corporate Airpark)	682	N/A
America Responds with Love, Inc. (Homeless Housing)	15	N/A
	10	N/A
Bucks County Housing Group w/Genesis Housing Corporation and TRF Development	Unknown	TBD
ESI Equipment, Inc. (Education)	10	N/A
ACTS Retirement-Life Communities Inc.	80	30
Play and Learn, Inc. (Daycare)	5	TBD
<b>Total Requested Acreage</b>	<b>1623</b>	

Source: NOI Applications and RKG Associates, Inc., 2012

Notes:

N/A - Not Approved

TBD - To Be Determined

#### 4. Preferred Redevelopment Plan – Option E

The RKG planning team adjusted the land plan in accordance with the Board and staff recommendations and prepared the Preferred Reuse Plan - Option E plan. The full development program is presented in Table 4.

The plan was designed to incorporate best management practices (BMPs) for storm water management and to include the latest green and sustainable design principles. Examples include LEED buildings, Low Impact Design (LID), green infrastructure, complete streets and a range of energy efficiency and renewable energy options.

##### a.) Town Center

Option E includes a mixed-use, pedestrian-oriented Town Center that is accessible from both Horsham Road (Route 463) and Easton Road (Route 611). The Town Center will include retail, office, entertainment, and residential uses. The Town Center also provides a sense of place with gathering spaces and a plaza incorporated into the design. The plaza can accommodate a water feature or recreational uses such as an ice skating rink.

##### b.) Residential Uses

The plan provides for distinct residential neighborhoods that include a broad range of housing types and price levels. These neighborhoods are connected together through a network of streets, including a central Runway Boulevard, which provide access to parks and open space. The street network encourages walking and connectivity with the surrounding neighborhoods as well as other uses in the site, such as the Town Center. Residential neighborhoods are centered on a neighborhood park and have easy access to recreational uses including pedestrian and bicycle trails.

##### c.) Office Park

Office and business parks are proposed along Horsham Road and south of Maple Avenue and are in close proximity to the proposed Town Center. The office parks are also positioned to take advantage of public open space and golf course amenity that is located in the middle of the office development off Horsham Road.

##### d.) Hotel/Conference Center

A hotel and a conference center are located near the proposed office parks and mixed-use town center. The proposed hotel and convention center facility will have visibility from Easton Road. The hotel is positioned to draw upon the demand that will be generated from the proposed office parks.

**Table 4**  
**Land Use and Building Program**

Land Use	Acres	Units/Building Square Feet
<b>RESIDENTIAL</b>		
<b>UNITS</b>		
Large Lot Single Family	64.6	90
Small Lot Single Family	34.3	250
Townhomes	36.2	350
Apartments/Condos	13.3	300
Town Center Apartment/Condos	7.9	100
CCRC Independent Living	19.4	141
CCRC Assisted Living/Nursing	8.0	185
<b>Total Residential</b>	<b>183.7</b>	<b>1,416</b>
<b>COMMERCIAL</b>		
<b>SQUARE FEET</b>		
CCRC Med Office/Amenities	3.0	25,000
Hotel/Conference	6.3	137,000
Town Center Retail/Service/Restaurants	11.0	239,580
Town Center Office	3.0	65,340
Movies/Entertainment	5.0	54,450
Office Park	133.5	1,163,052
Retail	6.9	96,180
<b>Total Commercial</b>	<b>168.7</b>	<b>1,780,602</b>
<b>OTHER USES</b>		
<b>SQUARE FEET</b>		
Regional Recreation Center	20.2	100,000
Housing for Homeless	7.4	30 (Units)
School	40.0	152,727
Aviation Museum	13.1	200,000
Shared Lot	5.6	--
FAA Tower	3.0	--
Park/Open Space	204.8	--
Roads, Sidewalks, Paths, Etc.	215.5	--
<b>Total Other Uses</b>	<b>509.6</b>	<b>452,727</b>
		<b>1,446 Res. Units/ 1.8 Million Com. SF/ 452,727 Other SF</b>
<b>TOTAL</b>	<b>862.0</b>	<b>Other SF</b>

Source: HLRA and RKG Associates, Inc., 2011

e.) Congregate Care Retirement Community (CCRC)

A Continuing Care Retirement Community (CCRC) is proposed in the northeast portion of the study area site between the Runway Boulevard and Easton Road. A CCRC is a type of retirement community where a number of senior care needs, from assisted living, independent living and nursing home care, may all be met. Housing types within CCRC's can include detached and attached single family homes, duplexes, quadraplexes, apartments, and assisted living center and nursing care units. Medical office and other support facilities are also proposed in proximity to the CCRC.

f.) School

A 40-acre site is proposed for the Hatboro-Horsham School District for replacement of existing school facilities and future expansion. The proposed school site would include a future middle school, administrative and recreational uses. The school site is centrally located near the intersection of Runaway Boulevard and Privet Road extension and within walking distance of the residential neighborhoods. The school site is adjacent to the recreation center, which allows for the sharing of recreational facilities.

g.) Retail

In addition to the retail programmed into the Town Center, the final Preferred Redevelopment Plan has retail frontage along Easton Road. Easton Road is a well-travelled road, and retail located in this area is well-positioned to capture sales support from drive-by traffic.

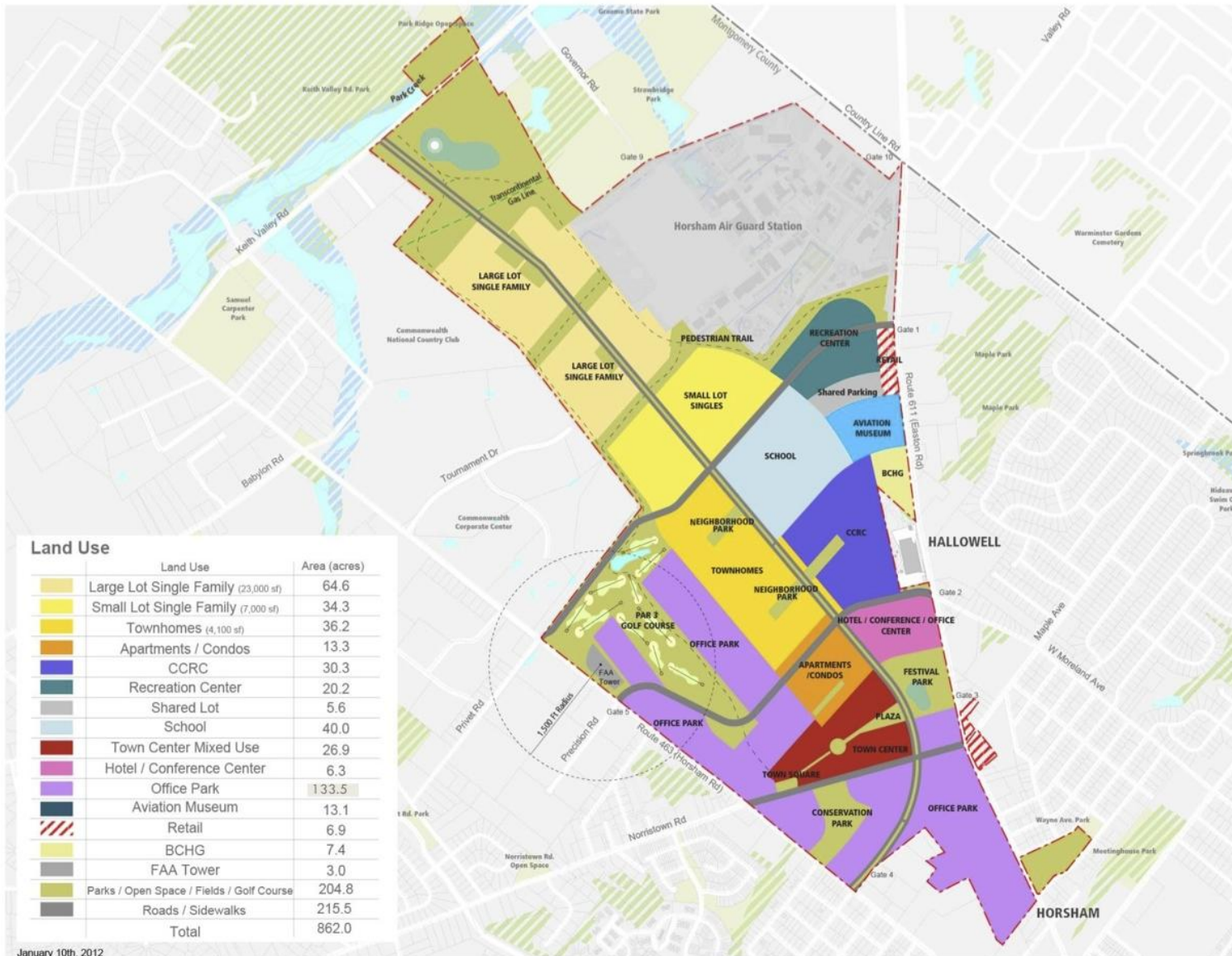
h.) Regional Recreation Center

A regional indoor recreation center with several outdoor recreation fields is proposed near the existing Gate 1 area with visibility from Easton Road and adjacent to the proposed middle school. The indoor recreation center will include multiple athletic features such as a gymnasium, swimming pool, basketball courts, climbing halls, multi-purpose hall, health and fitness club, tennis and racquetball courts. An outdoor recreational area is also proposed, and will include a range of active recreational fields including soccer, baseball, lacrosse, softball and others. It is hoped that these fields will be used to attract high school and collegiate tournaments for soccer and lacrosse, among others. The recreation center, school, and aviation museum/park were all carefully planned to be clustered together so they could share common facilities and open space features. This allows for a shared parking area between the three uses and shared recreational/field space.

i.) Aviation Museum/Park

A 13.1-acre site is proposed for the future aviation museum and park located on the eastern edge of the property with direct visibility from Easton Road. The aviation museum and park are being sponsored by Montgomery County, on behalf of the Delaware Valley Historical Aircraft Association (DVHAA). The DVHAA is a nonprofit entity currently operating the existing aviation museum on site. The proposed museum and park will include a number of restored aircraft within new hanger facilities and will include the existing Harold F. Pitcairn Wings of Freedom Air Museum located within the NAS-JRB site on Easton Road. In the recent past, the museum operated on 2.6 and more recently the HLRA provided additional access to 4.3 acres through a lease agreement between the Navy and the HLRA.

Map 1



**Preferred Base  
 Reuse Plan Alternative**  
  
**Option E**

Land Use	Land Use	Area (acres)
	Large Lot Single Family (23,000 sf)	64.6
	Small Lot Single Family (7,000 sf)	34.3
	Townhomes (4,100 sf)	36.2
	Apartments / Condos	13.3
	CCRC	30.3
	Recreation Center	20.2
	Shared Lot	5.6
	School	40.0
	Town Center Mixed Use	26.9
	Hotel / Conference Center	6.3
	Office Park	133.5
	Aviation Museum	13.1
	Retail	6.9
	BCHG	7.4
	FAA Tower	3.0
	Parks / Open Space / Fields / Golf Course	204.8
	Roads / Sidewalks	215.5
	<b>Total</b>	<b>862.0</b>

**Legend**

- Willow Grove NAS
- Municipal Boundary
- Parcel
- Parks and Open Space
- Horsham Air Guard Station
- Transcontinental Gas Line
- NWI Wetlands
- FEMA Flood Plain
- Vegetation
- Habitat Areas

**Sources**  
 NAS GIS data from Weston Solutions Inc. (received from Tetra Tech), Google and Bing Maps. Surrounding context data from DVRPC.

January 10th, 2012

j.) Homeless Housing

A 7 to 10 -acre site is proposed to accommodate housing for homeless. The site is located adjacent to the regional recreation center and would include the area adjacent to the existing military enclave north of the proposed Privet Road crossing. This site is proposed for homeless service providers to provide permanent supportive housing under provisions of the McKinney-Vento Act. The site will accommodate permanent supportive housing for up to 70 townhomes and duplex units.

k.) Parks/Open Space

The Redevelopment Plan includes a network of parks and open spaces which will be able to provide for a range of recreational uses and activities. A total of 205 acres of open space is proposed within the land use plan, which comprises about 24% percent of the total land area. The parks and open spaces will be able to support natural resources and vegetation. The park and open space network also will be designed to be part of a comprehensive stormwater management system and provide controls to address localized flooding issues at the property boundaries, especially along Keith Valley Road. Pedestrian and bicycle trails will connect the study area with existing local and regional trails within Horsham Township (Samuel Carpenter Park Trail and Power Line Trail, etc.).

- Neighborhood Parks – Small park areas located within residential neighborhoods.
- Community Parks - Located throughout the study area. They include:
- Community Golf Course - A 9-hole, Par 3 golf course is proposed within the middle of the property adjacent to the Commonwealth National Country Club. The golf course will include the existing pond. This “chip & putt” facility will be a recreational amenity open to the public and will also serve as an open space amenity for the office park.
- Green Corridors and Trails - The Runway Boulevard is also proposed as a green corridor that will connect the entire development together and serve as a central road through the site. It will feature a wide median that will include pedestrian and bicycle trails and bio-swailes as well as best management practices for storm water management. A network of walking paths will traverse the property and connect with the township’s existing public trail/bike path network.
- Open Space near Office Parks - Open space is proposed near the office parks along Horsham Road as an amenity to the office uses.

**5. Reduction in Residential Density**

The Preferred Reuse Plan has evolved from three preliminary reuse options and a Preferred Reuse Plan – Option D. The final Preferred Reuse Plan – Option E is the community’s reconciliation of the proposed development program, including the NOI request. The most significant change in the development program is the reduction in residential density at NAS-JRB Willow Grove. In

**Table 5**  
**Changes in Residential Building Program**  
**Preferred Reuse Plan (Options D and E)**

<b>Land Use</b>	<b>Option D Reuse Plan</b>	<b>Option E Reuse Plan</b>	<b>Percent Change</b>
Large Lot Single Family	169	90	-47%
Small Lot Single Family	297	250	-16%
Townhomes	396	350	-12%
Apartments/Condos	645	300	-53%
Town Center Apartment/Condos	114	100	-12%
CCRC Independent Living	126	126	0%
CCRC Assisted Living/Nursing	252	200	-21%
<b>Total - Market Rate Residential</b>	<b>1999</b>	<b>1,416</b>	<b>-29%</b>
Permanent Supportive Housing	105	70	-33%

Source: RKG Associates, Inc., 2012

summary, the HLRA Board, based on community input, has decided to pull back densities by approximately 29% from the Option D recommendations. This is largely due to projected impacts on schools and traffic. Likewise, the original homeless housing request of 105 units has been reduced through negotiations to no more than 70 units of permanent supportive housing (Table 5).

## **6. Homeless Housing Negotiations**

### **a.) HLRA Board Decision**

On July 27, 2011, the HLRA Board approved a motion to include the BCHG's NOI in the three redevelopment plan alternatives, with the final site location, development size and method of conveyance to be determined by the reuse planning team and the HLRA Board at a later date.

The BCHG NOI proposal originally identified the Navy Lodge/Navy Exchange area and two other potential sites for new housing development that were not approved by the HLRA. Those include Site #1 located at 3 Columbia Avenue, which is an 8 to 9 acre site where 30 detached units of permanent rental housing for McKinney/HEARTH eligible individuals and households would be located. This site has been designated in the Preferred Reuse Plan as a park site for the nearby residential neighborhood. In addition, Site #3 located off Maple Avenue between Easton and Horsham Roads is in an area that is best suited for employment generating uses. This site is currently proposed as an office park that will be integrated into a mixed-use town center development. Designating this area for housing would be inconsistent with the proposed uses and reduce the economic viability of the plan.

### **b.) Initial Offer for Navy Lodge and 7.4 Acres**

As part of BCHG's original NOI request, the applicant requested use of the Navy Lodge facility in order to convert it into 1- and 2-bedroom apartment units. The applicants also requested the use of the Navy Exchange facility for office and support space. The HLRA agreed that the Navy Lodge could adequately support some of the BCHG's permanent supportive housing needs as presented in their application. In addition, the building could be adaptively reused to provide space for the various services required by the residents, including the applicant's administrative and office needs.

In its meeting with BCHG on November 18, 2011, the HLRA Executive Director tentatively accepted the applicant's request for the Navy Lodge building and the land immediately surrounding the structure (Attachment N). This includes an area roughly 7.4 acres in size bordered by Easton Road and Skytrain Ave. The proposed site was included as part of the applicant's NOI (Site #2), which included the Navy Lodge building. This area would be well suited for housing, as it is bordered by other proposed residential and public uses and is located along the only public transit bus line. The location also borders Easton Road, which would allow for access to public transportation options. A total of 30-units of homeless housing were tentatively offered by the HLRA Executive Director at this location.

### **c.) Request for Formal Response to Initial Offer**

At the conclusion of the November 18, 2011 meeting, the applicant was also encouraged to investigate additional potential housing unit yield at this location in addition to the 30 units at the Navy Lodge. BCHG was asked to prepare a concept plan showing the potential housing yield of the site, with and without the Navy Lodge, and to provide a formal response to HLRA's offer. In a December 12, 2011 letter from BCHG, the applicant did not respond to the HLRA's initial offer, but reiterated their interest in obtaining a site suitable to construct 105 units of permanent supportive housing (Attachment O).

In a second letter dated January 16, 2012, the HLRA restated its request for a formal response to its initial offer on November 18, 2011 for 30 units on 7.4 acres at the former Navy Lodge site (Attachment P). At a meeting held on January 25, 2012, the HLRA Executive Director discussed with the BCHG the potential to accommodate a number of homeless units above the previously discussed 30 units at the Navy Lodge site (Attachment Q). It was hoped that the applicant would produce a preliminary concept plan showing the potential housing unit yield at the 7.4-acre Navy Lodge site. The applicants expressed a desire to create a residential community of townhomes and duplexes that would fit into the rest of the NAS-JRB redevelopment and would not stand out. With townhome densities of roughly 9.6 units per acre in the Preferred Redevelopment Plan, the Navy Lodge site could potentially yield roughly 70 units of townhomes. A maximum of 70 permanent supportive housing units was discussed as a new upper limit, although the HLRA expressed concerns about how 70 units would be planned on the 7.4-acre site. As such, the BCHG was asked again to provide a concept plan for the Navy Lodge site that would accommodate up to 70 units of townhomes and duplexes. The applicants were instructed to use reasonable assumptions about potential setbacks and open space requirements, since the Township's zoning ordinance does not currently provide for such a development.

On February 2, 2012, the HLRA learned through a phone call with the applicant that they were not working on a concept plan for the Navy Lodge site, and wanted to discuss other potential development sites.

d.) Review of Potential Privet Road Site and 70 Units

On February 8, 2012, the HLRA met again with the BCHG to discuss suitable locations for permanent supportive housing (Attachment R). The HLRA confirmed that another site currently located next to the military enclave and north of the future Privet Road crossing could be a potential site for the applicant. The HLRA provided the applicant with an aerial photo and rough outline of the property, which is currently proposed as the site for a regional recreation center in the Preferred Reuse Plan. The applicants were asked to provide a concept plan for 70 units of homeless housing at that location so that it could be reviewed with the HLRA Board. The HLRA reiterated its intent to submit its redevelopment plan by the March 30, 2012 deadline, and would prefer to include a legally binding agreement with BCHG. If such an agreement was not completed in time, the HLRA would have to move forward without the applicant.

## **7. Homeless Housing Offer**

The provision of 15 to 27 units of permanent supportive housing could be accommodated by the applicants in a variety of ways: (1) stand alone construction, (2) incorporation into conventional market rate housing developments, or (3) adaptive reuse of existing structures. As part of its formal NOI request, BCHG requested use of the Navy Lodge facility in order to convert it into 1- and 2-bedroom apartment units. The applicants also requested the use of the Navy Exchange facility for office and support space. We believe that the Navy Lodge could adequately support some or all of the 15 to 27 units of permanent supportive housing. In addition, the building could be adaptively reused to provide space for the various services required by the residents, including the applicant's administrative and office needs. Alternatively, this need could be accommodated on a maximum of 2-3 acres somewhere on the base.



**H. RECOMMENDATIONS AND PUBLIC COMMENTS**

**To Be Completed**

**I. LEGALLY BINDING AGREEMENT**

**To Be Completed**

## ATTACHMENTS

- A. Public NOI Announcement – (Newspaper Clippings) (October 15, 2010)  
Public NOI Announcement – (HLRA Document Submitted to Newspapers) (October 15, 2010)
- B. Formal Outreach Letter (November 11, 2010)
- C. Outreach Letter Recipient List (November 11, 2010)
- D. PBC and Homeless Outreach Workshop NOI Workshop - Attendee Sign-in Sheets (December 16, 2011)
- E. PBC and Homeless Outreach Workshop - Powerpoint Presentation (December 16, 2010)
- F. NOI Information Booklet
- G. Summary Evaluation of NOI Applicants
- H. LRA Letter Requesting Additional Information from NOI Applicants (May 25, 2011)
- I. Applicant Responses to HLRA Request for Additional Information (June 15, 2011)
- J. HLRA Letter to NOI Applicants Summarizing Board Decision (August 4, 2011)
- K. BCHG/Genesis/TRF NOI Application Summary
- L. Philadelphia Stand Down NOI Application Summary
- M. America Responds with Love NOI Application Summary
- N. HLRA Meeting with BCHG Sign-in Sheet (November 16, 2011)
- O. Letter from BCHG Restating Original NOI Request (December 12, 2011)
- P. Letter from HLRA Requesting Formal Response to HLRA Request (January 16, 2012)
- Q. HLRA-BCHG January 25, 2012 Attendance Sheet
- R. HLRA-BCHG February 8, 2012 Attendance Sheet