# FEDERAL RESERVE BANK OF SAN FRANCISCO

# Community Investments Vol 16, Issue 2 Increasing the Harvest for Farmworker Housing

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Agriculture is a significant economic engine for the West, representing a total of almost \$40 billion dollars in gross state product for the nine states that comprise the Federal Reserve Bank of San Francisco's 12th District (see graph 1). The diversity of agricultural products found in the west is also a phenomenon producing the greatest variety of fruits, vegetable, flora and aquaculture in the United States. In fact this region can claim recognition as the exclusive domestic producer of several crops such as kiwi fruit in California, red raspberries in Washington and of course macadamia nuts in Hawaii.

Graph 1: 2001 Gross State Product (millions of dollars)								
State	Total GSP	Ag. Services, Forestry & Fishing	Agriculture as a % of total GSP					
US	\$10,137,190	\$60,054	\$80,596	1.39%				
AK	\$28,581	\$476	\$21	1.74%				
AZ	\$160,687	\$1,266	\$1,339	1.62%				
CA	\$1,359,265	\$11,667	\$12,768	1.80%				
HI	\$43,710	\$216	\$288	1.15%				
ID	\$36,905	\$452	\$1,691	5.81%				
NV	\$79,220	\$425	\$204	0.79%				
OR	\$120,055	\$1,427	\$1,648	2.56%				
UT	\$70,409	\$283	\$592	1.24%				
WA	\$222,950	\$2,329	\$2,428	2.13%				
		\$39.52	\$39.52 billion					

Such diverse and abundant output not only yields a significant income, but requires a huge labor pool to get the produce from the fields to the markets. Many crops are still quite labor-intensive for both cultivation and harvest, with harvest in particular being most demanding because it must be done within a limited time period. According to data collected by USDA's National Agricultural Statistics Service, most farms consist of ten or more laborers working fewer than 150 days per year. For 2002, USDA puts the number of farm workers of all types (i.e. year-round, seasonal and migrant¹) in the 12th District at over one million—34 percent of farm workers nationwide.²

The National Agricultural Workers Survey (NAWS) conducted in 1997-98 by the Department of Labor calculates 56 percent of farm workers as migrants (i.e. traveling between regions and states to secure work) while 44 percent reside in their communities year-round. The seasonal and large-scale nature of farming causes the population of farm workers to balloon for a brief period, resulting in a short-term housing crisis for often unprepared communities. A three-year survey of housing availability and conditions for migrant and seasonal farm workers conducted by the Housing Assistance

Council found that 52 percent of the housing intended for single-family occupancy was overcrowded. $\frac{4}{}$ 

Aside from the challenge of providing housing for this transient population, the limited housing available for permanent farm workers in predominately agricultural communities is often overpriced or substandard. This same survey found 32 percent of farmworker housing units in the four western states surveyed (CA, ID, OR, WA) could be considered either "moderately" or "severely substandard" with such conditions as sagging roofs, broken windows and rodent infestation. The majority of these units had children present.

#### **Barriers and Solutions**

In some communities, farm workers are simply one segment of the low-income population that is seeking decent housing within their means. In other communities, farming is the primary—if not the only—industry, with its own set of requirements that further complicate the effort to provide housing for this segment. According to the NAWS study, chronic underemployment and stagnating wages among farm workers puts this population at a disadvantage over other low-wage workers. This article looks at some of the ways that the challenges of both seasonal and permanent housing are being addressed in California, Washington and Oregon--states with the highest number of farm workers, largest number of farms and highest percent of migrant labor in the west (see <a href="Graph 2">Graph 2</a>). It is also interesting to note that the poverty rate in counties listed as top producers of agricultural revenue often exceeds the state average. The combination of all these factors seems to underscore the problems of density and affordability that show up consistently in the effort to house farm workers.

				Avg# of Workers on	Working	Working	
States	# of workers <sup>2</sup>	Total Farms	# of Farms w/ 10 + Workers	Forms with 10 + Workers	greater than 160 Days (Farms)	less than 160 Days (Farms)	% of Farms w Migrant Labor
Alaska	1,774	240	49	24	105	223	<1%
Arizona	36,459	2,678	609	50	1,786	1,755	16%
California	535,256	34,342	9,987	46	19,950	25,984	30%
Hawaii	12,640	1,527	271	33	834	1,141	15%
ldaho	49,390	6,995	1,038	31	3,448	5,727	17%
Nevada	5,177	1,024	107	25	631	753	<1%
Oregon	122,845	10,978	2,377	41	4,199	9,650	17%
Utah	20,703	4,570	379	24	1,817	3,768	<1%
Washington	262,528 1,046,772	13,598	4,660	50	6,238	12,069	26%

Information provided from Table 7 of the 2002 Census of Agriculture state level data (http://www.nass.usda.gov)

Farm Statistics for the 12th District of the Federal Reserve

## **Financing**

Figuring out how to finance projects targeted at a population that earns roughly 48 percent of wages paid to production workers in the non-farm sector is a significant challenge. The reality of almost every farmworker housing project is the complexity of financing that involves a web of partners and various layers of subsidies. Federal and state government assistance is available through several programs including USDA 502 self help, USDA 514 loan and 516 farm worker housing grants, Low Income Housing Tax Credits, CDBG grants, HUD Rural Housing and Economic Development and state housing trust funds.

The Rural Community Assistance Corporation (RCAC)-sponsored <u>Casa Del Sol</u> project illustrates many of the resources and partners needed to take a development from concept to fruition. It also includes a component of philanthropic financing, which is recognized as an essential element in subsidizing housing for temporary and low-wage workers.

<sup>&</sup>lt;sup>2</sup>The Department of Health and Human Services commissioned an enumeration study

that provides a by-county count and overall reveals a significantly larger number of workers

<sup>(</sup>http://www.bphc.hrsa.gov/migrant/Enumeration/EnumerationStudy.htm;

http://www.casaoforegon.org/farmworker%20enumeration%20study.pdf).

<sup>1</sup>http://www.nass.usda.gov

CASA DEL SO	DL (Woodland, CA)
SOURCES	AMOUNT
City of Woodland (CDBG 108 loan)	
CA Dept of Housing and Community Development	\$1.5 million Joe Serna grant8 \$1.5 million Mobilehome Park Resident Ownership Program9
Rural Community Assistance Corporation	\$1.2 million AWHHP grant funded by the California Endowment
Red Capital Mortgage	Construction loan and 40-year first mortgage
Bank of America	Construction financing
Federal Home Loan Bank SF	\$660,000 AHP grant
Housing and Urban Development	FHA 207(m) credit enhancement10

Beyond financing, there are three common barriers to developing affordable housing in farming communities: unincorporation, zoning and limited space. Unincorporated rural areas frequently lack the infrastructure to support any type of housing development. The additional cost of installing basic water, sewage and energy infrastructure makes the price for even the most modest housing project prohibitive—particularly if the units are targeted at a seasonal population. In many states, special permission must be obtained to build housing on land zoned for agricultural use. In other states, the proximity of agriculture to cities or tight restrictions on growth limits the land available for new housing. How different states and jurisdictions cope with addressing these barriers not only determines whether housing is available, but can serve as an example for others to follow.

#### **CALIFORNIA**

Limited space and astronomical costs for both construction and land are the top barriers to providing adequate housing for farm workers in California. And yet one of the most innovative solutions for farmworker housing comes from a location that embodies every obstacle associated with affordable housing: the Napa Valley.

Since 1992, Napa County has collected nearly \$11 million dollars by taxing residential and commercial construction for a trust fund that finances the construction and preservation of housing for low-income Napa County residents. This relatively compact geography with expensive real estate and very low vacancy rates is overwhelmed every year with numerous grape harvesters. However, with the cooperation of perhaps the most critical stakeholders--the growers and wineries--local zoning laws were altered to allow housing on agricultural lands, motivating several growers to not only donate land but also construct both temporary and permanent facilities. The annual cost to operate this temporary housing -which has added 300 beds--is subsidized with the support of annual fundraisers and donations from a local trade association—the Napa Vintners Association.

In the San Joaquin valley, a longer growing season, extensive variety and, large crop volumes, and agricultural processing jobs support year round employment reducing excessive seasonal swelling common to other regions. In this eight-county area that spans the center of California, the need for housing is for permanent units that can be afforded by larger families. Self-Help Enterprises (SHE), a nonprofit housing developer serving this expansive region, has responded to this need with a focus on self-help homeownership units, rehabilitation and infrastructure development. With generous donor support and sweat equity from families—most farmworker families—SHE produced over 100 new homes in 2003 alone.

Throughout California, the boundary between urban and rural is frequently seamless with many farms in the backyard of cities or on the boundary of expensive suburbs. With this kind of close proximity comes NIMBY backlash. In Oxnard, California, a coastal city in Ventura county, House Farm Workers! is heading off NIMBYism through community building. *House Farm Workers!*, a project of the Ventura County Ag Futures Alliance Farm Worker Housing Task Force, proposes to increase the supply of farmworker housing through

community education, dialogue and advocacy. Education is conducted through the use of specially created videos and speaker bureaus to inform the public about the farm worker housing crisis and its effect on the local agricultural economy. The county wide task force and local action groups are focused on addressing resistance by homeowners to the building of higher density and low-income housing, a lack of sites, and a lack of political will to support farmworker housing construction. The project overcomes these obstacles by empowering farm worker families to become strong, vocal advocates for proposed farm worker housing projects in their communities. The groups also foster relationships with elected officials through private meetings and at council meetings.

#### **OREGON**

In Oregon, strict zoning laws and smart growth policies intended to preserve open space and agricultural land impedes the capacity for developing farm worker housing near or on farms. And yet in 1989, the Oregon legislature passed a state tax credit to encourage more housing for farm workers. The tax credit can be used by developers to build new housing or rehabilitate existing housing, much of which are farm labor camps that are several decades old. Despite the tax credit, which was increased in 2001 to allow deduction of 50 percent of the eligible costs incurred, the number of units available to house farm workers in Oregon is decreasing. However, the possibility of transferring 100 percent (effective 1/05) of the credit to a donor and the increase in funds allocated—currently \$7.25 million—makes the tax credit not only an incentive for donors but a promising tool for farm worker housing. (Note: Oregon lenders qualify for a different state tax credit for loans made to construct or rehabilitate farm worker housing). <sup>12</sup>

Nonprofit organizations acting as housing developers such as <u>Community</u> and <u>Shelter Assistance Corporation (CASA)</u> of Oregon and <u>Housing</u>

<u>Development Corporation of Northwest Oregon</u> are finding success in their efforts to provide housing in-town for year-round farm workers. And while

community-based housing –as opposed to on-farm—offers many advantages such as access to services, stability and reduced dependence on the employer, the higher cost of housing production in urban and suburban areas limits the amount of housing stock that can be built and absorbs a larger portion of the limited income farm workers earn. 13 It also increases the competition among low-wage workers for a shrinking supply of affordable housing.

To address the need for seasonal housing that is needed by migrant or temporary crop harvesters, Peter Hainley, executive director of CASA, believes that the answer may be to stimulate the economy of rural areas to employ more residents and support additional housing. Integral to this strategy is increased funding for rural nonprofits that are involved with providing a range of services in these communities including job development, asset building, self-help housing and health programs.

Towards this goal, CASA became certified as a Community Development Financial Institution (CDFI) in 2000 in order to facilitate the development of housing and other essential community facilities (e.g. community centers, medical facilities and Head Start buildings) in underserved rural areas. One of the primary activities of the CDFI is to finance predevelopment activities such as market analysis, environmental studies and land acquisition. CASA also provides critical construction financing to keep the project on target in anticipation of funding from multiple sources. Recruiting contributors for this fund is a priority for CASA as the funding directly stimulates new construction by increasing the capacity of local nonprofit project sponsors.

Catholic Charities is one such project sponsor that CASA has assisted. The project, Sandy Vista, is located in the small suburban town of Sandy and near the largest nursery producing area in the state. The land was acquired from a private owner on the contingency that it would be annexed into the town in order to avoid potential NIMBY issues that could result from a public

hearing. The annexation also conveyed an infrastructure benefit to the town because of the new sewer system that was completed for the project. Phase one of the 54-unit housing development and community complex that will house both migrant and year-round farm workers was just completed. The first phase includes the 30 units to be occupied by migrant farm workers and their families that move from farm to farm following various seasonal crop harvests. This kind of housing can be especially difficult for workers to find because of the short-term nature of residency. The second phase of 24 units for year-round farm workers and their families is currently under construction.

Sandy Vista	Budget	USDA /RD	Trust Fund	HELP1	HOME	FWTC	FHLB	ORR2
Phase One	SA 180 A38	\$2,810,436	81001/	\$75K	\$400K	\$568K	eanoir	
Phase	\$4,100,430	\$2,610,430	\$100K	3/5K	\$400K	3000K	3205K	
Two	\$3,537,183	\$2,114,359	\$100K	\$75K	\$300K	\$870K	\$168K	\$100K

1 http://www.ohcs.oregon.gov/OHCS/HRS\_HELPFacts.shtml

2 http://www.ohcs.oregon.gov/OHCS/HFS ORRFacts.shtml

The Sandy Vista project is an excellent example of the many different funding sources that come together to make a project possible.

#### WASHINGTON

Washington state exemplifies the importance that leadership plays in how funding is allocated and prioritized. Washington's Governor, Gary Locke, identified housing for farm workers as the most critical housing need in the state, appropriating an additional \$8 million commitment from the state capital budget biennially for 10 years to finance both permanent and seasonal housing. The use of Low Income Housing Tax Credits for farmworker housing projects is also strong in Washington, reflecting a resource allocation priority for housing in rural areas. The result has been a number of innovative and creative farmworker housing solutions. Since 1998, the number of permanent units has roughly doubled to almost 1300 beds and the number of temporary beds has seen an extraordinary growth to almost 4000.

In particular, there appears to be more on-farm housing per capita in Washington than in any other state discussed in this article. A number of Oregon farms have labor camps, but many of these are operating without certification due to rigorous health and safety standards imposed by the state and the cost of complying with these standards. The success of using farm land for housing in Washington is based on the strong coordination of government, private and nonprofit stakeholders such as the state-funded One Stop Development Center, the Washington Growers League, the Office of Rural and Farmworker Housing (ORFH), community-based developers and of course the farmers themselves.

In the realm of temporary housing, perhaps nothing reflects innovation and partnership more than the Rent-a-Tent program. (In California, rather than tents, Yurts serve as temporary housing for seasonal workers in the Napa Valley.)<sup>17</sup> Although controversial among several affordable housing advocates as a long-term solution, the success of this practical experiment is a compelling strategy worth highlighting. The Rent-a-Tent program started in 2000 with a demonstration grant from HUD. What began with a few tents has grown into 193 tents on 13 cherry farms across eastern Washington. Each tent can house six persons during the six-week cherry harvest season. Prior to the tents, many of the cherry harvesters simply camped wherever they could in their own tents. Currently, the Department of Community, Trade and Economic Development (WTED) purchases the tents with state funds and rents them for \$75 per week to eligible growers who have developed the necessary infrastructure to support housing. At an initial cost of \$3,100 and expected utility of seven years, the tents appear to represent a viable solution. Pat Arnold, newly appointed housing program manager at the Washington Growers League, reports that she will continue to seek efficiencies for the Rent-A-Tent program in the areas of labor and storage and looks forward to identifying other equally innovative partnerships that benefit the farmers and laborers.

Farmers can access state-funded technical assistance to develop infrastructure that meets state and county regulatory guidelines. Creative Housing Solutions, INC., which provides this assistance on behalf of the state's One Stop Development Center, also serves as a liaison between the farmers and various government departments that determine the regulations. Their role as liaison has helped to build trust with the farmers and reduce some of the regulatory red tape for the shared goal of increasing farmworker housing. Although many farmers charge the workers a nominal fee to cover utilities such as water and electricity, the cost of financing the infrastructure is still often prohibitive. Dixie Tracht, executive director of Creative Housing Solutions, sees this as an important area that bank and/or nonprofit lenders can fill through low-interest loans.

Another strategy to close the gap on construction costs, development fees and other expenses associated with housing development for farm workers and their families is a farmworker trust fund proposed by U.S. Senator Patty Murray. Similar to the Napa, California model, the trust fund will be a vehicle for private and philanthropic dollars to be amassed on behalf of farmworker housing. According to Brien Thane of the Office of Rural and Farmworker Housing, currently the fiscal agent managing seed funds that Senator Murray secured to help establish the trust fund, it would be used to expand the managerial capacity of organizations involved with housing development and cover a number of miscellaneous costs that can derail otherwise feasible projects.

## **Regional Solutions Beyond Housing**

The sheer number of farm workers in California, Oregon and Washington, and the remarkable impact to these states' gross state product necessitated solutions. But what about other states that are not faced with this same degree of population and land pressure. Do states with fewer farm workers – especially migrants— and a lower cost of living cope better with housing these workers? For the community of Wenden-Salome, Arizona, the answer

appears to be no. The seasonal influx of agricultural workers in this western valley region of Arizona actually exacerbates an already economically and physically impaired community. The Wenden-Salome Flood Recovery Commission, Inc. is taking up the charge to improve the quality and availability of housing for the general area, which is seen as a more holistic and sustainable approach than merely providing housing for farm workers (see Wenden-Salome).

## Agricultural Data for Federal Reserve Bank of San Francisco's District1

	Alaska	Arizona	California	Hawaii	Idaho	Nevada	Oregon	Utah	Washington
	Alaska Receipts from Farm Marketings (2002)	Arizona Annual Crops (2003)	Agricultural Statistical Review (2001)	Statistics of Heweii Agriculture (2002)	Annual Bulletin (2003)	Nevada Agricultural Statistics (2002)	Oregon Agriculture: Facts & Figures (2002)	Annual Bulletin (2003)	Washington Agriculture (2002)
percentage of land that is dedicated to agriculture <sup>2</sup>	n/a	36.6	27.6	31.6	22.2	9	27.8	22.3	36
top three commodities (by value)	livestock	cotton	milk and cream	pineapples	potatoes	cattle & calves	greenhouse & nursery	cattle and calves	apples
	aquaculture	hay	grapes	sugercane	wheat (all)	dairy products	cattle and calves	milk	milk
	greenhouse & nursery	wheat	nursery	seed crops	barley	hay (all)	hay (all)	hay	wheat
top three counties by revenue (poverty rate for individuals in 1999)	Matanuska Valley <sup>3</sup>	Yuma (19%)	Fresno (23%)	Hawaii (16%)	Twin Falls (13%)	Elko (9%)	Marion (7%)	San Juan (31%)	Grant (17%)
	Tanana Valley	Maricopa (12%)	Tulare (24%)	Maui (11%)	Canyon (12%)	Washoe (10%)	Clackamas (7%)	Box Elder (7%)	Franklin (19%)
	Kenai Peninsula	Pinal (17%)	Monterey (14%)	Kauai (11%)	Bingham (12%)	Humboldt (10%)	Washington (7%)	Duchesne (17%)	Yakima (20%)
market value of products sold <sup>4</sup>	\$46.1 million	\$2.45 billion	\$25.7 billion	\$5.42 million	\$3.91 billion	\$5 million	\$3.6 billion	\$1.12 billion	\$5.33 billion

<sup>&</sup>lt;sup>1</sup>State reports, National Agricultural Statistical Services, USDA

This parallels the approach of nonprofits in other geographies with a significant reliance on seasonal farm workers or migrants, many of whom ultimately end up settling in the community after the harvest is completed. The Idaho Migrant Council, Centro de la Familia de Utah, PPEP, Inc. of Arizona and Mid-Peninsula Housing Coalition of California are going beyond just housing to focus on solutions that empower the individual such as literacy and ESL training, job skill development, health services and Head Start programs. Rural Community Assistance Corporation, which assists

<sup>&</sup>lt;sup>2</sup>Table 8. Land in Farms, 2002 Census of Agriculture; USDA

<sup>&</sup>lt;sup>3</sup>Alaska does not differentiate its agricultrual areas according to the census designation of boroughs which prevents being able to calculate poverty rates.

<sup>4</sup>http://www.nass.usda.gov/census/

rural communities in 13 western states, also recognizes the importance of a multi-pronged approach in serving agricultural workers. RCAC has worked in affordable housing and environmental infrastructure for more than 25 years and in 1999 established the Agricultural Worker Health and Housing program (AWHHP) with a \$31 million award from The California Endowment.

Farm workers are enormously important to the economy of the west. Of the nine states that comprise the Fed's 12th District, six depend on temporary (i.e. migrant and seasonal) resources to meet the demands of their agricultural output. The solutions and organizations highlighted in story, demonstrate the importance of local leadership in resolving a complex issue.

Whether trailer parks, tents, dormitories, sweat equity homes or apartment units, the efforts to overcome multiple barriers to produce affordable housing for farm workers are as varied as the crops grown. Where possible, the approach that seems to show the most promise is rehabilitation of existing housing such as trailer parks in California. Rehabilitation reduces pre-development costs associated with new construction and delays that can come from permitting and zoning, in addition to eliminating blight.

But, rehabilitation is not a universal solution. As illustrated by the examples discussed, the solution that any location decides on will depend on factors and resources unique to that community. Hopefully these examples will prompt new ideas for dealing with a problem that touches many segments of society—decent and affordable housing – and motivate you to seek out and support organizations that are successful in housing farm workers.

# **Food for Thought**

In addition to being successful agents of community development, these and other organizations focused on housing farm workers can also serve as effective partners for reaching a significant unbanked population. The opportunity appears to be ripe to provide financial education and services for

a population that relies on informal mechanisms for cashing payroll checks and other financial transactions. At least some of these farm workers remit money to relatives in other countries, while others are looking to establish permanent roots through homeownership. A close working relationship with organizations that are resolving one of the most basic needs—housing—presents financial institutions with myriad opportunities to strengthen rural economies and serve an often overlooked demographic—farm workers.

#### Read more.....

David Sidley, Coachella Valley Mobile Home Parks Transformed, Rural Voices, Housing Assistance Council, Summer 2003: pp 21-22.

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<sup>7</sup>The Rural Housing and Economic Development (RHED) Program provides for capacity building at the state and local level for rural housing and

<sup>&</sup>lt;sup>1</sup>For the purposes of this paper, the definition for migrant is that used by USDA to mean a farm worker whose employment required travel of more than 75 miles and prevented returning to his residence the same day.

<sup>&</sup>lt;sup>2</sup>Table 7. Hired Farm Labor, 2002 Census of Agriculture; USDA.

<sup>&</sup>lt;sup>3</sup>Findings from the <u>National Agricultural Workers Survey 1997-98</u>, Department of Labor, March 2000.

<sup>&</sup>lt;sup>4</sup>No Refuge From the Fields: Findings From A Survey of Farmworker Housing Conditions in the United States©, Housing Assistance Council, 2001: p.9.

<sup>&</sup>lt;sup>5</sup>Findings from NAWS.

<sup>&</sup>lt;sup>6</sup>Rural Housing Services's Section 514/516 <u>Farm Labor Housing Program: A Guide for Applicants.</u>

economic development and to support innovative housing and economic development activities in rural areas. Funds made available under this program are awarded competitively on an annual basis through a selection process conducted by HUD.

http://www.hud.gov/local/shared/working/localpo/xmfhsgmobilehomefacts.pdf

<sup>11</sup>Mi Casa Es Su Casa (17 minutes) and A Piece of the Puzzle (10 minutes) can be ordered from Point of View Films by contacting Dulanie Ellis at 805/640-1133 or via email. Contact Jessica Arciniega at 805/486-9665 or via email for more information about House Farm workers!

# <sup>14</sup>Farm workers in Oregon

<sup>15</sup>The One-Stop Development Center is a state-funded clearinghouse within the Department of Community, Trade and Economic Development to assist farmers plan and finance farmworker housing, obtain construction bids, building permits, and regulatory approvals. It operates a toll-free telephone number and also works on-site to provide consultation and advice regarding the development of farmworker housing. The Center was a critical partner in providing technical assistance to farmers who participated in the Infrastructure Loan Program.

<sup>&</sup>lt;sup>8</sup>Joe Serna Grant.

<sup>&</sup>lt;sup>9</sup>Mobilehome Park Resident Ownership Program.

<sup>&</sup>lt;sup>12</sup>Oregon Farmworker Housing Tax Credit Program

<sup>&</sup>lt;sup>13</sup>Farm workers In Oregon, a study of the League of Women Voters of Oregon, Fall 2000.

<sup>16</sup>The Office of Rural and Farmworker Housing (ORFH) is a private, statewide nonprofit corporation that develops housing for farm workers and other rural, low-income residents of Washington State. ORFH provides direct, comprehensive, development services to local nonprofit corporations, housing authorities, municipalities and other organizations and individuals interested in developing farm worker housing.

<sup>17</sup>Jenny Gomez, *Local Housing Trust Funds Plus Collaboration Equals Affordable Housing in Napa Valley*, <u>Rural Voices</u>, Housing Assistance Council,
Summer 2002: pp 16-17.