

## Staff Report

November 30, 2017

**To:** Town Council

**From:** Michael Yerman, Community Development Director  
Bob Nevins, Town Planner

**Thru:** Dara MacDonald, Town Manager

**Subject:** **Work Session-Gatesco Brush Creek Sketch Plan Proposal**

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### **Purpose:**

The purpose of the Work Session is to provide the Gatesco development team with an opportunity to present their Sketch Plan proposal to Town Council and for Council members to become better acquainted with the project and to ask questions. The goal is to have an open two-way dialogue as set forth in the County's Sketch Plan review process in order "to examine alternative approaches to development of the property, to participate in a process of joint planning and negotiation between the County (and Town) and the applicant to promote development and land use change which is consistent with the intent and purposes of this Resolution (and compatible with the vision and needs of the Upper North Valley)."

### **Background:**

The Gunnison County Staff Report provides the following background information on the Corner at Brush Creek Sketch Plan proposal: "The subject parcel is within three miles of the Town of Crested Butte. The Town and Gunnison County have not adopted an intergovernmental agreement related to a three mile plan. Where there may be conflicts between County and Town standards, County standards apply.

The Town of Crested Butte is a participating party in the Memorandum of Agreement (MOA) dated June 16, 1998 between Crested Butte Mountain Resort, the Town of Mt. Crested Butte, Gunnison County, and the Town of Crested Butte regarding the use of the subject parcel.

Two members of the Town Council (Jim Schmidt and Paul Merck) and the Town Manager, Dara MacDonald, have participated in the selection of this developer (Gatesco) during the request for proposals (RFP) process. The Town has also been sent of copy of the application for review and comment.

The County Staff Report continues, "the Town of Crested Butte submitted the following comments: The Town understands that the sketch plan phase is conceptual in nature and that the County Land Use Resolution requires the applicant to submit more detailed design, reports and studies to the County with the preliminary plan."

The Town requested that the County analyses include an assessment of impacts to the Town of Crested Butte as follows:

1. Analysis by the developer of how the development fulfills the workforce housing shortages identified in the Housing Needs Assessment.
2. Analysis of compatibility of scale, massing, and density of the development with the surrounding natural and built environment, and proposed mitigation to improve compatibility.
3. Assessment of impacts of increased impervious surface areas to drainage and erosion, and proposed mitigation of those impacts.
4. Assessment of impacts to Mt. Express and other transit delivery systems, and proposed mitigation of those impacts.
5. Assessment of traffic impacts to the Town of Crested Butte including SR135/Brush Creek, SR135 Red Lady Avenue, and Elk Avenue/Sixth Street and proposed mitigation of those impacts.
6. Assessment of increased demand for parking in the Town of Crested Butte, and proposed mitigation of those impacts.
7. Assessment of impacts of increased demand on Town of Crested Butte recreation programs and active recreation facilities such as athletic fields, and proposed impacts to mitigate those impacts.
8. A grading plan that shows existing and proposed contours and any landforms that will be retained to the greatest extent possible, and methods for screening or buffering visual impacts of the site.
9. Assessment of the impacts to the Crested Butte Community School and proposed mitigation of those impacts based on discussions with the school district.

### **Attachments**

1. Council Memo Update 11-30-17
2. Sketch Plan and Development Summary
3. Proposed Development Summary Sheet
4. County Review Process
5. Key Metrics Comparison Report



## Memorandum

**To:** Town Council  
**From:** Dara MacDonald, Town Manager  
**Subject:** Brush Creek development project  
**Date:** November 30, 2017 Update

Gatesco submitted a sketch plan application to Gunnison County and the public review process is currently underway. This memo is intended to update the Council on the process to date.

**1998** – The Town entered a Memorandum of Agreement along with Gunnison County, Mt. Crested Butte and Crested Butte Mountain Resort (“Participating Parties”) to participate in the purchase of the Brush Creek parcel from the Crested Butte Land Trust. The Towns and CBMR contributed \$75,000 towards the purchase of the 14.53 acre parcel. The County contributed an adjacent 2.53 acre parcel along with \$15,000.

The parcel is 17.06 acres in size and is parcel number 3255-120-00-063 in the County Assessor’s records.

**December, 2016** – Paula Swenson in her capacity as the acting director of the Gunnison Valley Regional Housing Authority (“GVRHA”) contacted the Participating Parties to inform us that she had been contacted by Doug Croft regarding a potential buyer for the Brush Creek property.

**January 13, 2017** – A purchase offer was received from Law of the Rockies on behalf of Gary Gates. A meeting was held with representatives from the Participating Parties. The parties decided to decline the purchase offer and to pursue a public process to entertain development proposals. It was suggested that a Request for Proposals (“RFP”) should be drafted.

**January 17, 2017** – The Council discussed the Brush Creek parcel at their regular meeting under Other Business. The Council indicated that they were open to considering an RFP, however, they did raise several concerns about the process and how the property would be developed. Following is the text of the email I sent to the parties on January 19, 2017:

Brush Creek MOU partners:

We had an interesting discussion with the Town Council on Tuesday night about the Brush Creek parcel. The Council views the land as a tremendous asset in their attempts to address affordable housing needs. In the end the Town is receptive to discussing potential uses/development for the property as well as a possible RFP. However, the Council will

likely want some fairly detailed planning of the property prior to issuance of the RFP. While everyone agrees that it will take strong private sector involvement and investment to develop the property, Crested Butte will want proscriptive requirements for affordable housing built into any RFP. That being said the Council does not feel that an appraisal of the property is ripe at this time.

The Council also encourages that if the Brush Creek MOU partners move ahead with disposition or development of the property that they work with the RTA to discuss long-term facility, intercept parking and transit needs and consider setting aside some portion of the property to fulfill those community needs in the future.

Alternatively, if the various partners are interested in simple disposition of the property, Crested Butte may be willing to purchase, although this is not the preferred option.

**February 8, 2017** - Jim Schmidt, Michael Yerman and myself attended a meeting with the Participating Parties on behalf of the Town. Representatives from the Town advocated for a strategy of a public planning process to provide some preliminary ideas to guide potential developers. The majority of the parties disagreed and advocated for not predetermining the uses with much specificity but rather to let the private sector come forward with development ideas that would work for them. We discussed that each entity would communicate their expectations for development of the property that they would like to see included in a Request for Qualifications (“RFQ”). Following an RFQ, qualified development teams would be selected to move forward with a more detailed RFP. Dara volunteered to take the lead on drafting the RFQ.

**February 17, 2017** – Draft of the RFQ was circulated to the Participating Parties. The resulting substantive changes from the draft were the removal of the request to set aside 6 acres for field space to accommodate this growing need in the north end of the valley, the inclusion of the public in the presentations on the RFQ responses by the developers and an “open house” for prospective bidders during the RFP phase of the process.

**March 6, 2017** – RFQ released to the public.

**March 31, 2017** – Deadline for responses to the RFQ. Five responses were received, one of whom eventually withdrew.

**April 27, 2017** – Interviews were held with three development teams, Michael Yerman and myself attended on behalf of the Town. The Participating Parties selected Gatesco and Larimer to proceed to the next step – responding to a Request for Proposals (“RFP”). The County took the lead on drafting the Request for Proposals which was similarly drafted to the RFQ with the addition of requesting information consistent with the County’s sketch plan requirements.

**May 1, 2017** – I reported to the Council under Staff Updates about the interviews on April 27<sup>th</sup>. Council briefly discussed the involvement they wanted to have in the process and it was agreed Schmidt would continue to be involved as it relates to his role as a representative on the board of the housing authority. Merck also expressed an interest in being involved. Council agreed that Schmidt and Merck would be the Town’s representatives along with staff.

**May 3, 2017** – Draft of the RFP was circulated to the Participating Parties.

**May 9, 2017** – The RFP was released to Gatesco and Larimer.

**June 23, 2017** – RFP responses were received from both parties.

**June 28, 2017** – Interviews were conducted with Gatesco & Larimer regarding their responses to the RFP. Jim Schmidt, Paul Merck, Michael Yerman and myself all attended on behalf of the Town. There was consensus among the Participating Parties that Gatesco had the stronger submittal. CBMR indicated Gatesco was their top choice.

**July 5, 2017** – The Town of Mt. Crested Butte and Gunnison County both communicated that Gatesco was their top choice.

**July 10, 2017** – The Crested Butte Town Council discussed the developer selection at their regular meeting under New Business. They directed the Town Manager to convey to the Participating Parties the Town Council's support for proceeding in negotiations with Gatesco for the development of the Brush Creek parcel in a manner similar to that proposed in the attached RFP response.

**July 12, 2017** – Matthew Birnie communicated with the Participating Parties that he had met with representatives from Gatesco to discuss next steps. Their discussion included potential deal points to consider with purchase of the property. He stated that the County would take the lead on drafting a sales contract that would be circulated to the Participating Parties for review and comment.

**July 21, 2017** – Town staff met with representatives from Gatesco to discuss the possibility of extending sewer service to Brush Creek. (No further discussions have occurred)

**July 24, 2017** – The County communicated they thought we would see a draft agreement soon for review.

**August 11, 2017** – The County communicated that the agreement is taking longer than anticipated due to other matters their legal office was immersed in.

**August 16, 2017** – Matthew let the Participating Parties know that Gatesco would like to proceed with the application for a land use change while the sales agreement was being negotiated. None of the Participating Parties indicated that they had any concerns with this action.

**August 28, 2017** – The County indicated they are close to being ready to circulate a draft of the sales agreement for review by the Participating Parties. Barbara Green and Dara spoke with David Leinsdorf who expressed concerns about the application process and decision making process under the Memorandum of Agreement.

**August 29, 2017** – Gatesco filed a sketch plan application with Gunnison County. This step places the County Commissioners firmly in their quasi-judicial role as decision makers on an active land use application process and thus they are restricted in the communications they may have on the substance of the application.

**August 31, 2017** – Staff requested a copy of the sketch plan application to review.

**September 6, 2017** – Scheduled meeting with Barbara Green, myself, David Baumgarten and Matthew Birnie to discuss Mt. Emmons and Brush Creek.

**October 6, 2017**-Town of Crested Butte hosted a Public Input Meeting on the Brush Creek development proposal at The Center for the Arts to gather public comments prior to submitting the Town's comments to Gunnison County. More than 200 people attended the meeting.

**October 10, 2017**- Town of Crested Butte submitted its Comments concerning the Corner at Brush Creek Sketch Plan application to the Gunnison County Community Development Director.

**October 20, 2017**- Gunnison County scheduled the first public Work Session with the Planning Commission at the County Commissioners' Chambers in Gunnison to listen to Planning Staff outline the review process and to hear a presentation by the applicant concerning the proposed development. More than 75 people were at the meeting and time was allocated for public comment.

**November 17, 2017**- The second Work Session focused on the Gunnison Valley Regional Housing Authority strategic plan, housing gap/needs, challenges, affordable housing guidelines, deed restrictions and examples of affordable housing projects in other mountain communities; the applicant provided their proposed mix of deed-restricted and free-market units and rental rates. About 35 people were in attendance and public comment was taken.

**Mid-December 2107**- The third Work Session will concentrate on density, mass, scale, unit type and architectural character; there will also be a site visit of similar sized projects in Gunnison and Skyland neighborhood.



### CORNER AT BRUSH CREEK SKETCH PLAN PROPOSAL

- Total site area: 14.29 acres
- Total number of units: 240 units
- Project density (gross): 16.8 units/acre
- Five different building types are proposed including:
 

8 Duplexes	(16 units)
6 Four-plexes	(24 units)
10 Eight-plexes	(80 units)
3 Sixteen-plexes	(48 units)
3 Twenty-four-plexes	(72 units)
- Unit Breakdowns, seven different unit types ranging from 500-1,300 square feet:
 

Efficiency Studio	32 units
1Bd, 1Ba	32 units
1Bd, 1Ba w/ Study	32 units
2Bd, 1Ba	36 units
2Bd, 2Ba	48 units
2Bd, 2Ba w/ Study	36 units
3Bd, 2Ba	24 units

## Corner at Brush Creek

### Proposed Development Summary Sheet

All uses proposed on the subject parcel are defined within the Sketch Plan submittal. Proposed uses include:

- 240 residential units with seven different unit types ranging from 500-1,300 square feet.
- Five different building types are proposed including:
  - 8 Duplexes (16 units)
  - 6 Four-plexes (24 units)
  - 10 Eight-plexes (80 units)
  - 3 Sixteen-plexes (48 units)
  - 3 Twenty-four-plexes (72 units)
- Unit Breakdowns:
 

Efficiency Studio	32 units
1Bd, 1Ba	32 units
1Bd, 1Ba w/ Study	32 units
2Bd, 1Ba	36 units
2Bd, 2Ba	48 units
2Bd, 2Ba w/ Study	36 units
3Bd, 2Ba	24 units
- 156 of the 240 units (65%) will be permanently deed restricted for qualifying households earning less than 180% of Area Median Income (AMI) based on income and residency. Rent caps will be placed on restricted units, but rents may be lower based on market conditions.
- No Short Term Rentals.
- Community center with convenience store and coffee shop, post office annex, gathering areas, bathrooms, storage facilities, and communal bike and ski workshop, ski lockers.
- Transit center (as part of community center) for RTA and Mountain Express service, including additional parking available to individuals that do not live in the subject development.
- Park & Ride: 69 spaces for entire Brush Creek neighborhood to ride buses into town from the transit center.
- Community garden, dog park, playground, open space, trails.
- Pets will be allowed with a dog park onsite. Limitations and restrictions on size, breeds and maximum numbers are being determined.
- 8 Acres Open Space featuring a central park, community garden, benches, picnic shelter, seated areas, playground, pet waste stations, soft surface trails system, and stream. 14.29 Acres total.
- Water and wastewater treatment facilities.

## Gunnison County Land Use Review Process

### Land Use Change application

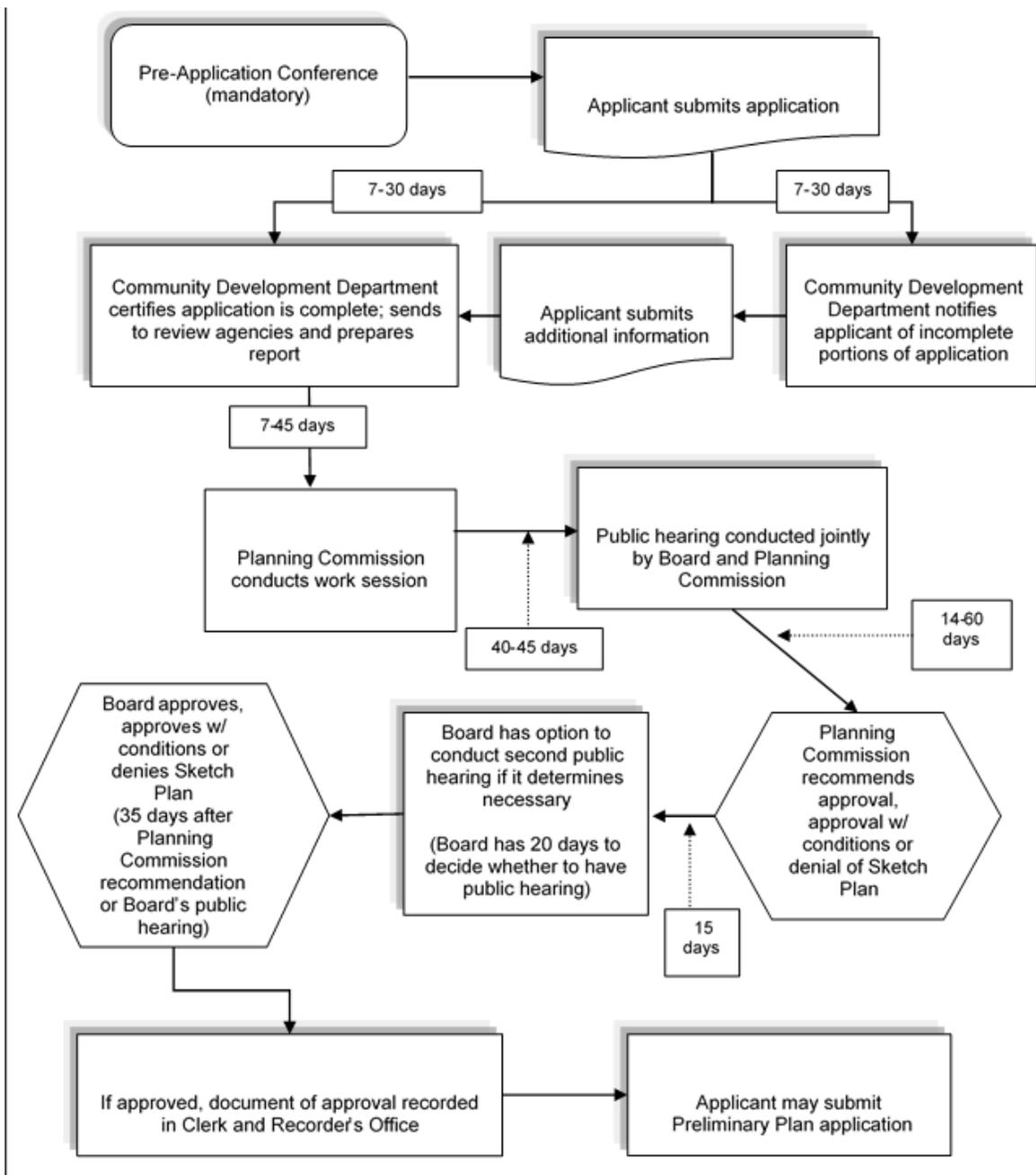
- The Corner at Brush Creek Land Use Change application submitted August 29, 2017
- Application verified complete on September 20, 2017
- First work session and site visit scheduled October 20, 2017-Project Introduction and Overview
- Second work session conducted November 17, 2017-Work Housing Requirements and Deed-Restrictions
- Third work session scheduled for mid-December-Density, Mass, Scale and Architecture
- No public hearings are scheduled yet ▫ 30-day notification required.
  - Posted in newspapers, County website
  - Poster at site
  - Certified mailing to all property owners within 500' of parcel

### Land Use Resolution (LUR)

- Major Impact Project (Section 7-101 of Gunnison County LUR)

## Sketch Plan (Current Phase)

- Sketch Plan: A. SKETCH PLAN IS EXPLORATORY. Sketch Plan review provides an opportunity for the County, the applicant, and the public to engage in an exploratory discussion of a proposed land use change, to examine alternative approaches to development of the property, to participate in a process of joint planning and negotiation between the County and the applicant to promote development and land use change which is consistent with the intent and purposes of this Resolution.
  
- ENGINEERED DESIGNS AND DETAILED PLANS NOT REQUIRED OR ACCEPTED AT SKETCH PLAN. To encourage the consideration of alternatives and to allow the Sketch Plan to evolve, detailed engineering plans and other overly detailed information shall not be required or accepted by the County.”
  
- There will be a joint public hearing(s) during the Sketch Plan process.

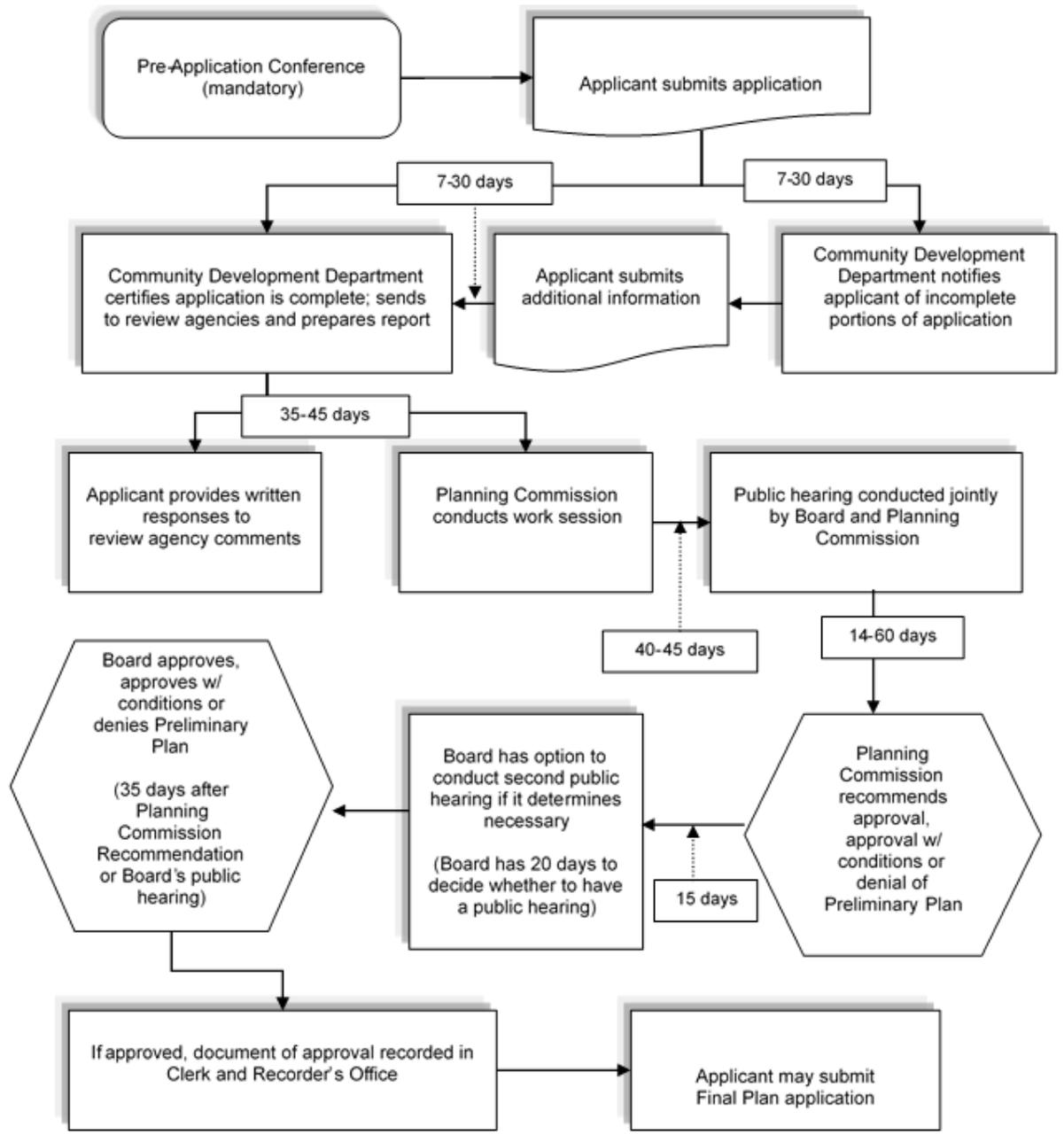


## Sketch Plan Review Process

**Estimated MINIMUM timeline for Sketch Plan review:** 140 days (4.6 months). The number of days shown between review steps is an estimated minimum. The number of applications being reviewed by the County, scheduling with the Board and Planning Commission, limited publication dates within weekly newspapers, and schedules of the applicant's surveyors, attorneys and engineers will affect actual length of review. Both the Planning Commission and Board may conduct work sessions and site visits in addition to the described meetings and hearings

## Preliminary Plan

- Preliminary Plan review requires the applicant to formulate detailed, design/engineered solutions to the issues and concerns identified during Sketch Plan review, and to address, in a site-specific manner, all other issues that are relevant to Preliminary Plan.
- There will be a joint public hearing(s) during the Preliminary Plan process.



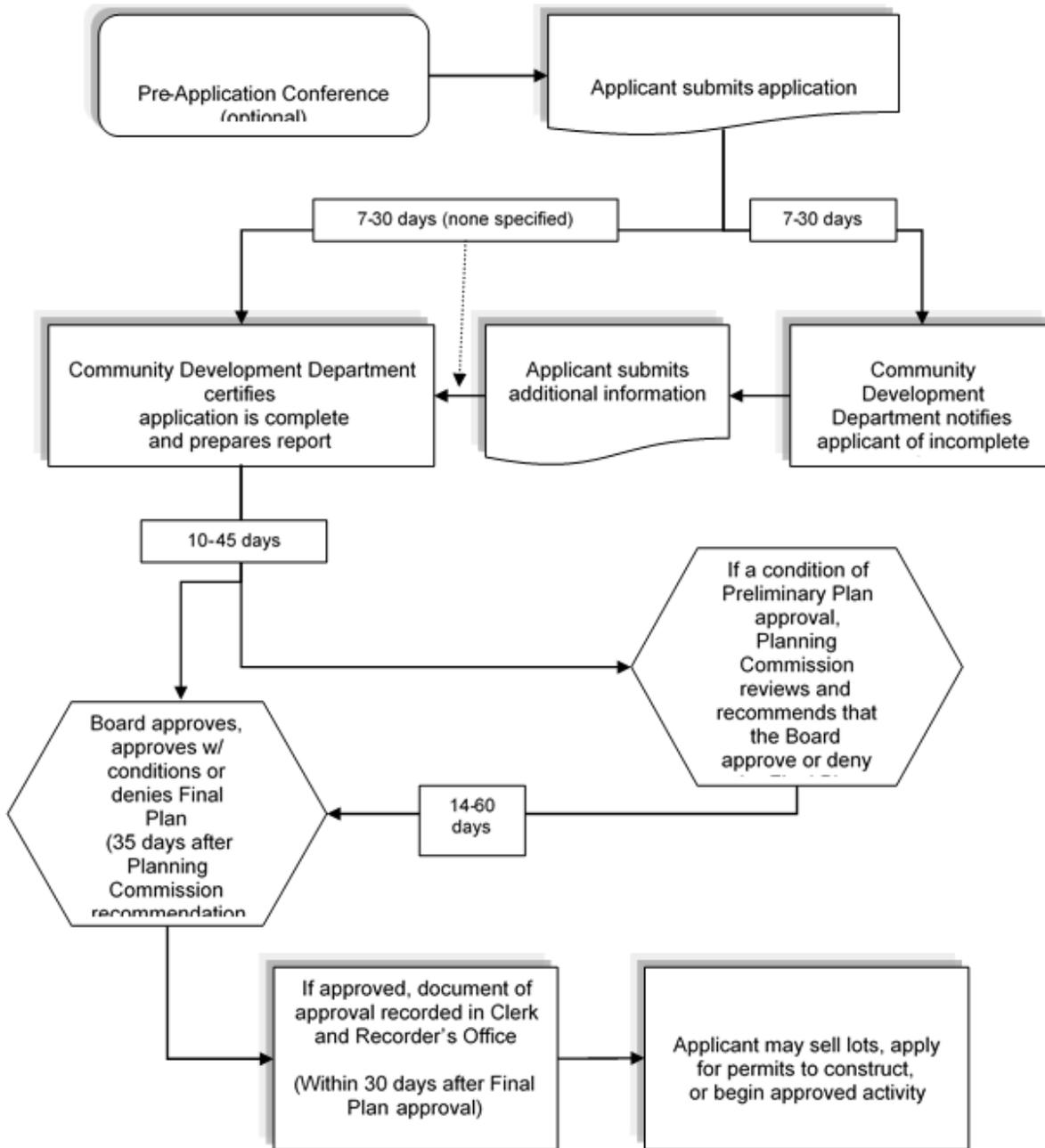
## Preliminary Plan Review Process

**Estimated MINIMUM timeline for Preliminary Plan review: 140 days (4.6 months).** The number of days shown between review steps is an estimated minimum. The number of applications being reviewed by the County, scheduling with the Board and Planning Commission, limited availability of publication dates within weekly newspapers, and schedules of the applicant's surveyors, attorneys and engineers will affect actual length of review. Both the Planning Commission and Board may conduct work sessions and site visits in addition to the described meetings and hearings.

## Final Plan

- Final plan review provides a permanent and accurate public record of the development plan: exact size, shape and location of all approved activities and uses, and, as applicable, lots, blocks, streets, easements and other parcels of land within the development, together with all applicable protective covenants, conditions, use restrictions and design and development criteria.
- There are no public hearings at Final Plan phase.

# Final Plan Review Process



**Key Metrics Comparison**

**The Corner at Brush Creek and**  
***2016 Gunnison Valley Housing Needs Assessment***

October 31, 2017

*Prepared for:*

**Town of Crested Butte**



**Melanie Rees**  
**Rees Consulting, Inc.**

## Introduction

This brief report compares The Corner at Brush Creek apartment project proposed by Gatesco to key metrics from the *2016 Gunnison Valley Housing Needs Assessment*. Specifically, it compares the number of units proposed by income range to the:

- Total inventory of rental housing in the North Valley;
- Deed-restricted rental inventory;
- Rents; and
- Need for rental units in the North Valley through 2020.

The proposed Brush Creek project would provide 240 units in a mix ranging from studios to three-bedroom units. As planned, 58 of the units would target low-income renters (<80% of the Area Median Income (AMI)), another 98 units would be affordable for middle- to upper-income households (>80% - 180% AMI), and the remaining 84 units would be market.

### Project Description – The Corner at Brush Creek

AMI	Cumulative # of Reserved Units*	Units by AMI Category <i>Consultant calculation</i>	Percent of Total Units
< 50%	16	16	6.7%
< 80%	58	42	17.5%
< 120%	120	62	25.8%
< 180%	156	36	15.0%
Total Reserved	156	156	65.0%
Total Market	84	(no rent or AMI specified)	35.0%
Total Proposed Units	240	N/A	100.0%

\*As presented in Brush Creek Sketch Plan Application

This comparison focuses on the North Valley since: 1) the Gunnison Valley has long been recognized to have distinct market areas; and 2) the North Valley estimate of need includes renters living in the Mid- and South-Valley areas who want to live in the North Valley.

**Disclaimer:** This report does not draw conclusions about the proposed project's marketability, feasibility, location, design (site plan, building type, bedroom mix, unit size and plans, amenities, parking), or risk as is typically covered in market studies required by developers, partners, and lenders.

## Comparison to Total Rental Inventory

The 240 rental units proposed would increase the inventory of rental housing in the North Valley by approximately 35%, from 688 units estimated in 2016 to a total of 928 units upon completion. The development would concentrate just over one-fourth of the rental units in the North Valley on a single site. This estimate assumes no other builders (private or public) develop rental units at the same time as Brush Creek, a reasonable assumption given other developers would likely have their concerns about competition.

### Housing Units by Use, 2016

	North Valley
Housing Units	3,684
Occupied Units	1,708
Owner Occupied	1,020
Renter Occupied	688

Source: Derived from State Demographer estimates.

## Comparison to Deed Restricted Inventory

If built as planned, Brush Creek will more than double the number of deed-restricted rental units in the North Valley, from 223 currently to 379 upon completion, an increase of 70%. Again, this estimate assumes no other deed-restricted rental units are developed simultaneously with Brush Creek.

### Deed Restricted Rentals, North Valley

	Renter	Either*	Total	Brush Creek	Total w/ Brush Creek
Crested Butte	129	57	186		186
Mt. Crested Butte	29	7	36		36
Unincorporated County	1	0	1	156	157
Total	159	64	223	156	379

\*Most are commercial buildings and likely renter occupied.

Source: GVRHA and planner interviews

## Rent Comparison

The Corner at Brush Creek Sketch Plan Application did not specify rents but rather described the method that would be used to calculate rents. The approach calls for setting rents at 30% of gross income. The application only provided the top end of the income range; however. It did not provide the income targets on which rents will be based for the whole range. For example, it is unclear if rents for the <80% AMI category would be affordable for renters with incomes at

60% AMI. It appears rents could be calculated based on the incomes of individual households and that different rates could be charged for each of the 156 reserved units, which is unusual.

A comparison of rents paid in 2016 to the proposed income targets for Brush Creek indicates rents as planned will be significantly higher than existing rates. While 22% of rental units were affordable for household with incomes at or below 50% AMI, only 6.7% of the Brush Creek units would target this range. (Again, note that only the upper end of the income range is specified for Brush Creek; the extent to which units will be affordable for renters below 50% AMI is unknown.)

The most notable difference between 2016 rent levels and rates proposed for Brush Creek is in the upper-income ranges. Approximately 8% of rents charged in 2016 were equivalent to rates affordable for 120% AMI or higher households. At Brush Creek, 50% of the proposed units will require incomes of 120% AMI or higher to be affordable.

#### Rent Paid by AMI, North Valley

Income (AMI)	2016 Rent Distribution by AMI	Brush Creek AMI Targets
≤50% AMI	22%	6.7%
50.1% - 80%	38%	17.5%
80.1% - 120%	33%	25.6%
120.1% - 200%	8%	50.0%*
> 200%	0%	
n/a	100%	100%

\*Combined 84 market units with 36 units reserved at <180% AMI.

Sources: 2016 Resident Survey and Brush Creek Sketch Plan Application

Rent comparisons are typically based on unit type (number of bedrooms). While the bedroom mix for the total project is provided in the Sketch Plan Application, it is not broken-down by AMI. It is unknown if the AMI targets will be distributed proportionately among all types of units, from studios through three-bedroom units.<sup>1</sup>

The following low- and high-end rents for Brush Creek are compared to 2016 median rents by number of bedrooms. The 50% AMI rents at Brush Creek would be lower than 2016 median rents but the 180% AMI rents could be much higher. For two-bedroom units, Brush Creek could charge \$2,871 for units reserved at 180% AMI (or higher if occupied by four or more persons), which would be more than twice as high as the median in 2016 of \$1,200.

<sup>1</sup> Fair Housing may be a concern. For example, the Colorado Housing and Finance Authority in its administration of Low Income Housing Tax Credits for rental housing requires that AMI targets be similar across all unit types to avoid discrimination or preferential treatment based on familial status and income.

### Median Rents, North Valley

# Bedrooms	Household Size Assumption	2016 Median Rent	Brush Creek Low End (50% AMI)	Brush Creek High End* (180% AMI)
1 BR	2	\$850	\$709	\$2,552
2 BR	3	\$1,200	\$798	\$2,871
3 BR	4	\$1,350	\$885	\$3,186

\*Assumes market units will rent for no more than affordable at 180% AMI.

Sources: 2016 Survey for median rents; Sketch Plan Application for 2017 income limits and rent calculation methodology

Note: The Sketch Plan Application does not indicate the rents will be charged for the 84 market units. An operating proforma and detailed AMI break down by unit type are needed to better understand the rents that will be charged and more definitively analyze how they compare to existing rents in the North Valley.

### Comparison to Projected Rental Needs in 2020

Overall, the Corner at Brush Creek proposes too many rental units relative to need. The 240 units proposed for Brush Creek exceed the total catch-up and keep-up needs for rental units in the North Valley through 2020 by 69 units (240 units proposed; 171 rental units needed).

The *2016 Gunnison Valley Housing Needs Assessment* estimated that 171 rental units would be needed in the North Valley to:

- Eliminate overcrowding;
- Create a functional rental market; and
- Provide housing for employees to fill existing unfilled jobs, new jobs and jobs vacated by retiring employees.

Of the 171-unit total, the report concluded the market should provide about 78 units leaving a gap of 93 rental units that would likely need to be subsidized. Overall the proposed units would need to capture 140% of total need for additional units to reach full occupancy (141 units needed ÷ 240 units proposed). Capture rates over 100% mean that projects create more units than demand, which leads to slow lease up, high vacancy rates and potentially project failure.

Furthermore, the project's proposed income targeting is not aligned with housing needs. While the project could address 35% of the need in the lowest income range, the capture rate (units proposed compared to units needed) would exceed 100% starting at 80% AMI. In the category above 120%, the capture rate is 375%. This indicates the proposed project would provide nearly four times the number of rental units needed for middle- to upper-income households. The *Housing Needs Assessment* recommended focusing on renter households with incomes at or below 80% AMI with rents up to \$1,200 per month.

### Units Needed Compared to Proposed, by AMI

AMI	Max. Affordable Rent, 2016	Rental Units Needed	Brush Creek	Capture Rate
≤50%	\$689	46	16	35%
50.1 – 80%	\$1,102	47	42	89%
80.1 – 120%	\$1,653	46	62	135%
120.1 – 200%+*	\$2,755+	32	120	375%
<b>Total/Overall</b>		<b>171</b>	<b>240</b>	<b>140%</b>

\*Combines market units with <180% reserved category.

Note: The 2016 Gunnison Valley Housing Needs Assessment estimate for rental needs in the North Valley includes the needs of renters who now live in the Mid-Valley and South-Valley market areas who want to live in the North Valley. The market for the units proposed by Gatesco to target incomes above 80% AMI is unclear since it exceeds the needs generated in the North Valley, including those of in-commuters who want to move.