

ZONING PRACTICE

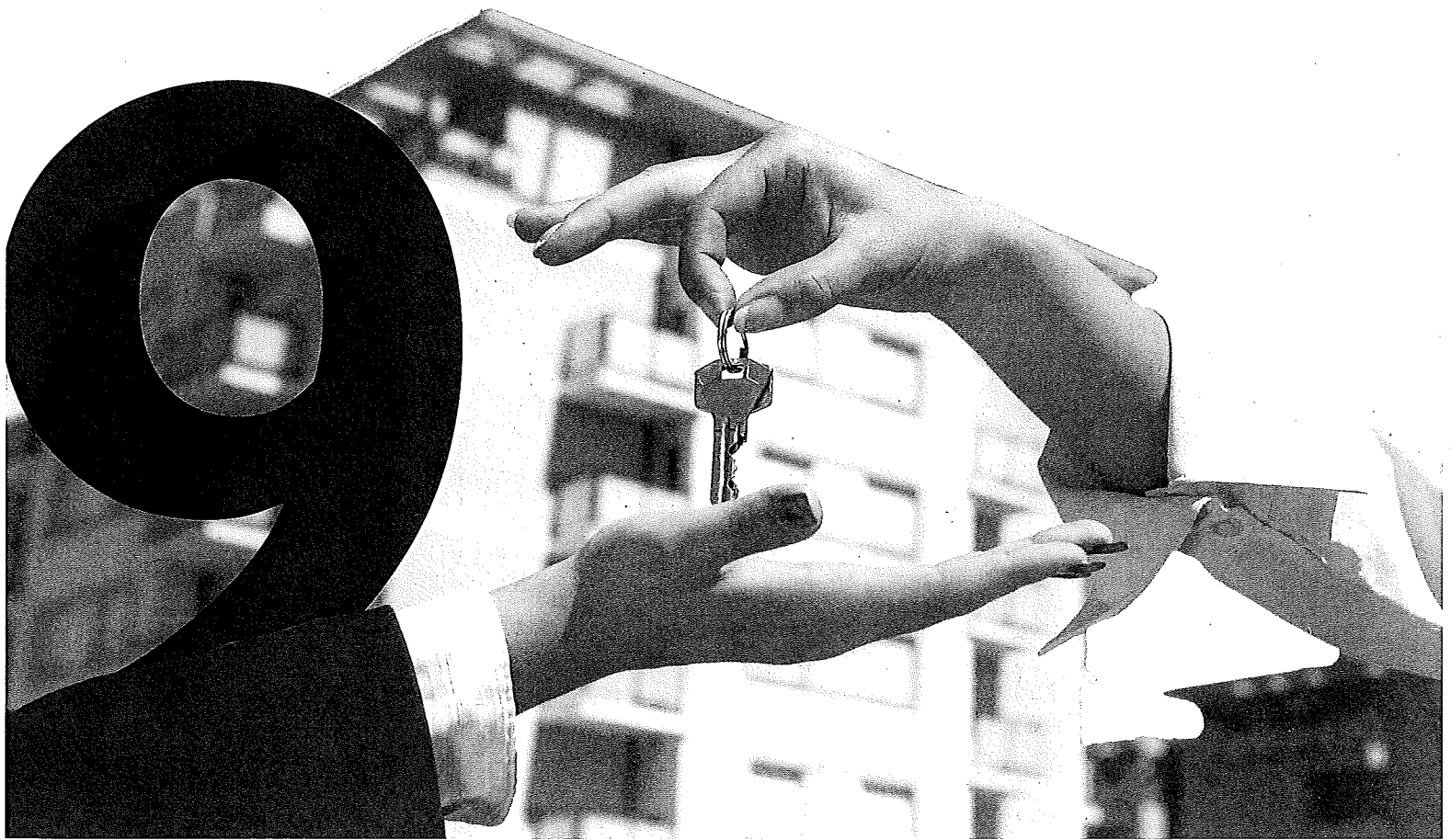
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PRACTICE AFFORDABLE HOUSING



Zoning to Support Low-Income Housing Tax Credit Projects

By Woo Kim, AICP

Housing affordability is a key component of social equity. In 2014, 20.8 million renter households in the U.S. spent more than 30 percent of their income on housing (HJCHS 2016). More American renters were housing burdened in 2014 than ever before, and housing insecurity puts into jeopardy other basic human needs such as education, health, and nutrition. Compounding this issue, many socioeconomic cohorts cluster within communities, resulting in low-income families living among other low-income families in resource-starved, majority-minority neighborhoods.

Over the past 20 years, the planning literature has covered inclusionary zoning extensively. While inclusionary zoning is an important tool for increasing the supply of new affordable housing, requiring developers to set aside a small percentage of new units as affordable is unlikely to fully address the demand for affordable housing in most communities. Cities with strong housing markets, such as San Francisco, New York, and Boston, are producing affordable units through inclusionary zoning, but the numbers are insufficient to keep up with rising rents or to address pervasive social inequity. Furthermore, many communities simply do not command high enough rents per square foot to absorb the subsidy required by affordable units. In fact, within the rapidly growing downtowns of cities such as Philadelphia, Pittsburgh, and Atlanta, inclusionary zoning can stymie much needed growth.

The federal Low-Income Housing Tax Credit (LIHTC) program is the most important resource for creating affordable housing in the U.S. today. These are typically fixed-rent units in mixed-income developments, where a majority of the units are deemed affordable to families earning less than 60 percent of the area median income (AMI). In contrast, inclusionary zoning projects seldom provide more than one affordable unit for every four market-rate units, and many inclusionary zoning ordinances target families earning 80 percent of AMI. For these reasons, the LIHTC

program is as, if not more, important than inclusionary zoning to address the demand for affordable housing. Nevertheless, the planning literature has, so far, been largely silent about the relationship between zoning and the development of LIHTC projects.

As a partial corrective, the following sections will discuss how LIHTC drives the production of affordable rental housing, summarize common zoning barriers to LIHTC projects, explore potential zoning reforms to address these barriers, and highlight brief case studies of communities that have been successful in making space for LIHTC projects by reforming their zoning codes.

THE LIHTC PROGRAM

The LIHTC program, created by the Tax Reform Act of 1986, gives investors a dollar-for-dollar reduction in their federal tax liability in exchange for providing financing to develop affordable rental housing (26 USC §42).

Before this, federal assistance for private affordable housing took the form of subsidies and vouchers from the U.S. Department of Housing and Urban Development (HUD).

The Need for LIHTC

In the 1980s, many private affordable housing owners decided to “opt out” of the project-based Section 8 program, resulting in a sharp decline of good quality rental housing for low-income families (Anderson et al. 2017). Housing advocates—including public housing authorities, nonprofit affordable housing developers, local government officials, nonprofit advocacy organizations, and low-income renters—organized to preserve this disappearing stock of affordable housing using whatever funding and financing was available to them. This housing crisis, together with a very visible nationwide homelessness epidemic, led to the creation of the LIHTC program.



Jeffery Tobarco

Ⓢ Zoning reform to support Low-Income Housing Tax Credit projects addresses social equity, particularly in fast-growing, high-rent cities such as Jersey City, New Jersey.

Program Basics

The Department of the Treasury's Internal Revenue Service (IRS) jointly administers the LIHTC program with state-designated housing credit agencies (HCAs). The IRS allocates tax credits to HCAs and provides program oversight. Then, HCAs determine which projects receive those tax credits and monitor LIHTC projects for program compliance.

Federal law establishes minimum project eligibility thresholds and requires each HCA to adopt a qualified allocation plan (QAP) to guide the merit-based distribution of LIHTCs. These QAPs must include, among other factors, location standards that determine project eligibility.

At a minimum, at least 20 percent of all units in an LIHTC project must be set aside as affordable rental units for households at or below 50 percent of AMI, or 40 percent of all units at 60 percent of AMI. In practice, however, most LIHTC developments are 100 percent affordable. LIHTC projects must be deed restricted to maintain affordability for a minimum period of 15 years, with an additional 15-year "extended-use" period, where project owners can apply for relief to opt out of affordability requirements. However, some states, and some local financing options, have longer required affordability periods.

Developers can apply to HCAs for LIHTCs to construct new or renovate existing rental buildings. The total amount of tax credit available to a project depends on its "applicable percentage" of tax credit, "eligible basis" of development costs, and "applicable fraction" of rent-restricted units.

The "applicable percentage" refers to the type of tax credit the developer is seeking. LIHTCs are designed to subsidize either 30 or 70 percent of the low-income unit costs in a project. The 30 percent subsidy, which is known as 4 percent tax credit, covers new construction that uses additional subsidies or the acquisition cost of existing buildings. The 70 percent subsidy, or nine percent tax credit, supports new construction with minimal subsidies.

The "eligible basis" refers to the development costs that can be subsidized by tax credits. These include building acquisition or construction costs, costs associated with soil testing or engineering, and costs associated with utility connections, but they do not include land acquisition or financing costs. Projects located in Qualified Census

Tracts (i.e., low-income or high-poverty census tracts) and Difficult Development Areas (i.e., areas with high construction costs relative to AMI) can subsidize 130 percent of eligible costs.

The "applicable fraction" refers to relative size of the affordable component of a project. This is calculated as the lesser of either the ratio of affordable units to all units or the ratio of affordable unit floor area to total project floor area.

Putting it all together, multiplying the eligible basis by the applicable fraction determines the "qualified basis" of the project. Multiplying the qualified basis by the applicable percentage (i.e., four or nine percent) determines the total amount of tax credit available to a project.

Once an HCA has awarded a developer LIHTCs, the developer can sell those credits to investors to generate equity for affordable housing development. In return, investors claim the tax credits over a 10-year period and may even collect partial cash flow from the project.

LIHTC and Other Affordable Housing Strategies

LIHTCs can be paired with other HUD-sponsored affordable housing programs such as Housing Opportunities for People Everywhere, Choice Neighborhoods, Community Development Block Grant, Home Investments Partnerships, and project-based vouchers, as well as state and local funding. LIHTC units can also cater to special population groups including seniors, the LGBTQ community, veterans, and other vulnerable classes that are often underhoused. Tax credit housing developments are usually multifamily (due to economies of scale), but can occasionally be single- or two-family rental homes.

While there is no inherent barrier to using LIHTC to finance affordable units required by a local inclusionary zoning ordinance, these tools seldom work in concert to affect project design. This is because relatively few local zoning codes require developers to set aside at least 20 percent of all units in a project as affordable units, and relatively few require all those units to be affordable to households earning 50 percent of AMI. Therefore, most projects that depend on LIHTC credits for gap financing will satisfy inclusionary zoning requirements, but it is, perhaps, unlikely that the presence of those

inclusionary zoning requirements influenced the mix of units in the project. In fact, the overwhelming majority of LIHTC projects between 1987 and 2014 did not include any market-rate units (HUD 2016). This would seem to indicate that there is little overlap between developers who only include affordable units in their projects to satisfy inclusionary zoning requirements and developers using LIHTC credits.

Results of the LIHTC Program

In 2016 the IRS allocated \$2.35 in credit per capita (IRS 2015). Between 1987 and 2014, the LIHTC program placed 2.78 million housing units in service, averaging more than 107,000 units per year from 1995 to 2014 (HUD 2016).

These units are distributed across the country in urban, suburban, and rural communities. They include units targeted at families, older residents, those with disabilities, and those experiencing homelessness. Among projects with reported data, more than a third of the affordable units put in service between 1987 and 2014 were in Qualified Census Tracts (HUD 2016).

The prevalence of LIHTC projects in high-poverty neighborhoods is intuitive, considering both the program's higher potential subsidy for projects in those areas and the strong opposition by residents in many communities to siting low-income housing in higher-income areas. However, the long-standing trend toward steering affordable housing into high-poverty neighborhoods was recently challenged by the U.S. Supreme Court's 2015 decision in *Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc.*

The court's ruling endorsed the notion of citing disparate impact in housing cases. In essence, lower courts are now equipped to cite the disparate impact clause of the 1968 Fair Housing Act when new affordable housing is clustered together in resource-starved neighborhoods. The Supreme Court ruled that decisions and practices have discriminatory effects—even without discriminatory intentions. The case stemmed from a Texas lawsuit that claimed that the state had contributed to "segregated housing patterns by allocating too many tax credits to housing in predominantly black inner-city areas and too few in predominantly white suburban neighborhoods."

THE RELATIONSHIP BETWEEN ZONING AND LIHTC ALLOCATION CRITERIA

Simply put, zoning controls the permissible locations and forms of new development. As noted above, all state-level QAPs include location factors that determine, in part, a project's eligibility for LIHTCs. When local zoning is out of sync with its state QAP,

developers interested in low-income housing projects face an uphill climb.

QAP Location Factors

Federal law stipulates that QAPs must consider project location, but does not specify any location criteria. In practice, most QAPs prioritize density and access to amenities

such as mass transit, open space, civic uses, sources of fresh foods, schools, and health assets. Additionally, many states allocate tax credits by geographic region to distribute affordable housing more equitably throughout. Some states hold one round of tax credit applications for urban areas and another round for suburban and rural areas.

LOCATION EFFICIENCY FACTORS IN CALIFORNIA'S 2017 QAP

Measure	Points
Projects with mass transit within 1/3 mile and a density of 25 units per acre	7
Projects within 1/2 mile of a public park	3
Projects within 1/2 mile of a library	3
Projects within 1/2 mile of a full-scale grocery store	5
Projects in varying degrees of proximity to accessible public schools	3
Projects within 1/2 mile of a qualifying clinic	3
Projects within 1/2 mile of a pharmacy	2

LOCATION EFFICIENCY FACTORS IN TEXAS'S 2017 QAP

Measure	Points
Project within 1/2 mile of a public park	1
Project within 1/2 mile of public transportation	1
Project within 1 mile of a full-service grocery store or pharmacy	1
Project within 3 miles of a health-related facility	1
Project within 2 miles of a center that provides child care programs	1
Project located in a census tract with a property crime rate of less than 26 per 1,000	1
Project within 1 mile of a public library	1
Project within 5 miles of a university or community college campus	1
Project in a census tract with high educational attainment	1
Project within 2 miles of a museum	1
Project within 1 mile of an indoor recreation facility available to the public	1
Project within 1 mile of an outdoor recreation facility available to the public	1
Project within 1 mile of community, civic, or service organizations	1
Project within the attendance zone of high-performing schools	3

LOCATION EFFICIENCY FACTORS IN NEW JERSEY'S 2017 QAP

Measure	Points
Low-density buildings where 25% of tax credit units are large family units	5
Project located within a TOD where at least 5% of units are large family units	5
Project within 1/2 mile of positive land uses (grocery, pharmacy, bank, etc.)	6
Project within 1 mile of negative land uses (land fill, dumps, superfund site, etc.)	3
Rehab of a historic building/adaptive reuse of a nonresidential building	1
Project located within 1/2 mile of public transportation	2
Project within a school district where students are meeting or exceeding expectations	2
Project located within a municipality with as many public and private sector jobs as units	2
Project that satisfies state affordable housing obligation	1

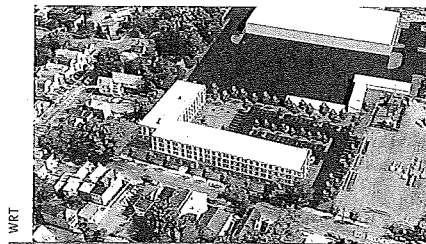
Most QAPs establish a point system for scoring potential LIHTC projects, and due to the highly competitive nature of LIHTC awards, every point counts. Most states allocate anywhere from 10 to 20 percent of total points for satisfying measures of location efficiency (e.g., proximity to community assets and positive land uses). These points can mean the difference between a funded project and an unviable one. Furthermore, some states deduct points from applications that are in proximity to undesirable land uses. For example, in New Jersey, large family projects in transit-oriented developments earn five points, but projects within a mile of undesirable land uses (e.g., landfills, dumps, superfund sites, etc.) lose three points.

Common Zoning Barriers to LIHTC Projects

Despite increasing housing affordability and social inequity issues, many communities have zoning codes that act as barriers to LIHTC projects. The largest, and perhaps most common, zoning barrier is the geographically extensive application of low-density residential zoning districts. That is, many communities only permit multifamily residential development in a small number of zoning districts, mapped to a small percentage of the jurisdiction's total area. Given that most affordable housing development depends on economies of scale for viability, this practice severely constrains LIHTC project opportunities, even before considering any location-efficiency factors.

Similarly, the dimensional standards and density limits in many zoning districts that permit multifamily development make LIHTC projects infeasible. Minimum setbacks, maximum heights, and maximum residential density standards all affect the per-unit cost of development. Holding all other factors equal, the lower the density, the higher the per-unit cost of development.

The same idea applies to zoning codes that require the same amount of off-street parking per dwelling unit, regardless of community context or project characteristics. The more required parking, the higher the per-unit cost of development. LIHTC projects often generate less parking demand than comparable market-rate projects. According to the 2009 National Household Travel Survey, low-income households own fewer automobiles per capita than moderate-income households, and a higher percentage



East Orange, New Jersey, and its development partner, the Community Builders, plan to build a four-story affordable housing development and an adjacent economic development project funded by nine percent LIHTC and New Market Tax Credits on this site in the Sussex Avenue Redevelopment Plan area.

of low-income households rely on public transit for transportation (FHWA n.d.).

Beyond this, zoning often poses additional barriers to siting LIHTC projects in locations that satisfy location-efficiency measures. In most communities, high location-efficiency areas are typically downtowns and neighborhood centers. However, many zoning codes either prohibit residences in these predominantly commercial areas or require vertical mixed use development, with ground-floor commercial space, which complicates project financing and management.

Additionally, many zoning codes have single-use zoning districts where land uses that help satisfy location-efficiency measures, such as supermarkets, pharmacies, farmers markets, and libraries, are far removed from residential districts. Isolated shopping centers along major highways contain many "QAP points" that cannot be used.

Many suburban communities have mapped exclusively single-family zoning districts in close proximity to highly ranked schools. This is in spite of the fact that many states, including California, Texas, and New Jersey, award extra QAP points to developments in catchment zones of high-performing schools. If not for limitations of very low-density zoning, many of these districts would be prime areas for LIHTC projects. Communities concerned about LIHTC housing impacts to school districts should balance the impact on test scores with life-changing opportunities provided to low-income students. Communities concerned

SPOTLIGHT ON EAST ORANGE, NEW JERSEY

The Sussex Area Redevelopment Area is situated in the Fourth Ward of East Orange, New Jersey. The area is characterized by a mix of uses and zoning districts. The area has long been an important component of the city's overall revitalization and housing strategy, by virtue of its proximity and accessibility to major highways, Newark, and the city core. The area included the site of the former Arcadian Gardens—a low-density urban renewal public housing complex—and the Sussex Mall shopping center just north of it. In 2011 the city council declared the area "an area in need of rehabilitation," and by virtue of a redevelopment plan, upzoned multiple underutilized sites. As a result, private-sector developers are proposing light industrial warehouses and a mixed-income affordable housing apartment building using New Market and Low-Income Housing Tax Credits.

about LIHTC housing impacts to property values can review many recent studies (backed by empirical data) that show little to no negative impact—despite common misconceptions.

LIHTC FRIENDLY ZONING

While zoning barriers to LIHTC projects are prevalent, the good news is that there are several conceptually simple fixes. These include strategic upzoning, special-purpose zoning districts or overlays, and zoning incentives or flexible standards for LIHTC-eligible projects.

Strategic Upzoning

Given the strong correlation between permissible residential density and the per-unit costs of residential development, perhaps the most meaningful fix that communities can enact is strategic upzoning of areas that are rich in assets. Review the location factors in your state's QAP, and look for opportunities to increase the permissible residential density in zoning districts that permit or are proximate to land uses that contribute to location efficiency. These are typically downtowns, neighborhood centers, and major corridors. They may also be residential areas surrounding schools or near parks.

Special-Purpose Districts or Overlays

For communities without mixed use zoning districts, there may be opportunities to adopt new pedestrian- or transit-oriented zoning districts or overlays. These special-purpose districts or overlays typically permit higher-density mixed residential and commercial development and include form controls, such as build-to lines or permissible frontages or building types, to ensure that new development supports walking and transit use. District or overlay standards may also reduce minimum off-street parking requirements to facilitate higher density development.

Many state QAPs include location-efficiency measures that can provide a useful starting point for conversations about district or overlay boundaries. For example, the QAPs for California, New Jersey, and Texas all include points for development within a half-mile of public transportation.

Incentives for LIHTC-Eligible Projects

In addition to district-specific standards, communities can also support LIHTC-eligible projects through use-specific standards. These may be incentives, such as bonus density or reduced minimum off-street parking requirements, for affordable housing projects that satisfy target income requirements and QAP location factors. Alternately, they may be use-specific development standards that offer affordable housing developers flexibility in site and building design.

For example, rapidly growing city of Marysville, Washington, provides a 50 percent density bonus for affordable housing development (§22C.090). These projects must permanently offer all units at rents affordable to households earning 50 percent AMI. Projects reserved for residents over age 62 are eligible for a higher maximum density on sites of less than five acres.

Communities can also adopt use-specific standards to facilitate adaptive reuse of existing structures originally designed for nonresidential use. Near downtown, these may be obsolete industrial buildings near existing amenities and services. In residential neighborhoods, these may be surplus or obsolete institutional buildings near parks or high-performing schools.

To illustrate, Whitehall Township in Lehigh County, Pennsylvania, permits the adaptive reuse of former commercial,

institutional, or industrial buildings in all residential districts for affordable housing projects (§27-199.1 et seq.). Projects consisting exclusively of units that meet all LIHTC program requirements qualify for higher permissible densities and lower minimum off-street parking requirements.

CONCLUSIONS

The debate on where poor families should live is heated and happening in almost every community across the country. Despite a lack of evidence, the NIMBY sentiment is clear: Housing for the poor decreases property values, lowers school performance metrics, and increases crime rates. However, in many instances, exclusionary zoning practices have resulted in where we are today—patchworks of inequitable communities where poor families are deprived of opportunities that are easily attainable by middle-income families.

In the same manner that many progressive zoning codes are promoting walkability by supplementing Euclidean zoning practices with form-based districts and standards, why not view zoning through the lens of social equity? Reforming zoning codes to make room for affordable housing is an important step in the right direction.

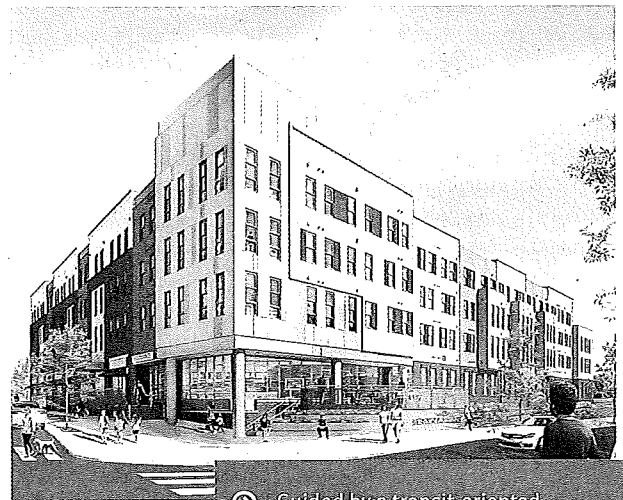
In many communities, supporting social equity lies at the intersection of affordable housing and zoning. A better understanding of the backgrounds and policies that guide Low-Income Housing Tax Credit projects will equip communities to proactively shape their communities for a future that provides opportunities for all families and children.

Mixing tax credit housing mixed with other types of housing in compact, walkable, vibrant places results in stronger, more equitable communities because they (1) foster the next generation of leaders; (2) benefit the larger community; and (3) result in positive outcomes for families.

The need for affordable housing exists whether we choose to address it or not, and

SPOTLIGHT ON MERIDEN, CONNECTICUT

The Connecticut Department of Transportation has designated Meriden, Connecticut's downtown Amtrak station as an express stop for a new commuter rail line connecting New Haven, Connecticut, to Springfield, Massachusetts. In anticipation of this new, higher-frequency rail service, the city embarked on a multiyear planning process to transform its downtown. As a result of this process, the city adopted a new transit-oriented development (TOD) district in 2013 for its downtown core (§213-27). This district includes extensive form controls and defines and regulates LIHTC-eligible projects as a distinct land use (i.e., TOD mixed-income dwellings), subject to higher permissible densities and lower minimum off-street parking requirements than market-rate multifamily residential projects. Following the adoption of this district, the city, its housing authority, and its development partners have been awarded multiple competitive nine percent LIHTC awards, reactivating its downtown with mixed-income families who will soon have the option to take rail transit to jobs centers such as Hartford and New Haven.



Guided by a transit-oriented development zoning overlay and a Choice Neighborhoods Transformation Plan, Meriden Commons, developed by Pennrose Properties and planned and designed by WRIT, is one of six phases of mixed-income housing in downtown Meriden, Connecticut.



Jeffery Totaro

⊕ The John C. Anderson Apartments in Philadelphia, developed by Penrose Properties and designed by WRT, is an example of a nine percent LIHTC project that activates an urban street while housing a vulnerable population in the city.

SPOTLIGHT ON JOHN C. ANDERSON APARTMENTS

The John C. Anderson Apartments is a 56-unit, six-story complex located in the core of Philadelphia's dense and vibrant Washington Square West neighborhood. Fronting on busy 13th Street, where it abuts high-rise neighbors, but also extending back to one of Philadelphia's "littlest streets"—revered for its charming residential character—the project presented unique urban design and architectural challenges. All the apartments are one-bedroom units, with supportive services provided by the building. The ground floor has 1,800 square feet of commercial space, reserved for tenant-serving uses and a small cafe, activating a once underutilized parcel of land on an otherwise vibrant street. The goal of this project was to provide affordable housing open to all low-income persons 62 years or older, but to do so in an environment that celebrates diversity and creates a setting where elders of the LGBT community can feel fully welcome and secure. The facility is only the second one in the nation with such focus. At the time of permitting, zoning variances were required to make the project feasible. Philadelphia has since overhauled its zoning ordinance to make mixed use, mixed-income projects like John C. Anderson Apartments easier to accomplish.

addressing it proactively is the right thing to do. Children from low-income families deserve pathways to opportunity and a level playing field.

A well-functioning local economy requires a workforce at all income levels. In most communities, tenants of tax credit housing are teachers, public safety officials, civil servants, and service sector employees. When they benefit from shorter commutes,

more time with families, and extra spending power, the entire community benefits.

Housing stability is the foundation for positive outcomes in education, health, and employment. Tax credit housing allows a family to send their children to good schools, have access to fresh foods from a full-service grocery store, and live in close proximity to jobs—resulting in better outcomes for all family members.

ABOUT THE AUTHOR

Woo Kim, AICP, is a leader in WRT's housing and neighborhoods practice. His work at WRT is primarily focused on neighborhood revitalization and development of equitable communities. To date, he has planned for the development of thousands of affordable housing units nationwide.

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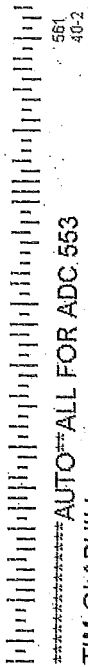
REFERENCES

- Anderson, Michael et al. 2017. "Chapter 1, Section 3: A Brief Historical Overview of Affordable Rental Housing." In *Advocates' Guide 2017: A Primer on Federal Affordable Housing & Community Development Programs*. Washington, D.C.: National Low Income Housing Coalition. Available at tinyurl.com/yd6kxvew8.
- California, State of. 2017. *Code of Regulations*. Title 4: Business Regulations. Title 17: California Tax Credit Allocation Committee Regulations Implementing the Federal and State Low Income Housing Tax Credit Laws. Available at tinyurl.com/ydfzqdrf.
- Federal Highway Administration (FHWA). n.d. "National Household Travel Survey: Online Analysis Tools." Available at nhts.ornl.gov/tools.shtml.
- Harvard Joint Center for Housing Studies (HJCHS). 2016. "Chapter 6: Housing Challenges." In *State of the Nation's Housing 2016*. Cambridge, Massachusetts: Harvard Joint Center for Housing Studies.
- Harvard Joint Center for Housing Studies. Available at tinyurl.com/yd70qo.
- Internal Revenue Service (IRS). 2015. "Revenue Procedures 2015-53." *Internal Revenue Bulletin: 2015-44*, November 2. Available at irs.gov/irb/2015-44_IRB/ar10.html.
- New Jersey, State of. 2017. *Administrative Code*. Title 5: Community Affairs. Chapter 80: New Jersey Housing and Mortgage Finance Agency. Subchapter 33: Low Income Housing Tax Credit Qualified Allocation Plan. Available at tinyurl.com/ybxv5vz.
- Texas Department of Housing and Community Affairs, State of. 2016. *2017 Qualified Allocation Plan*. Available at tdhca.state.tx.us/multifamily/docs/17-QAP.pdf.
- U.S. Department of Housing and Urban Development (HUD). 2016. "LIHTC Database." Available at lihtc.huduser.gov.

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