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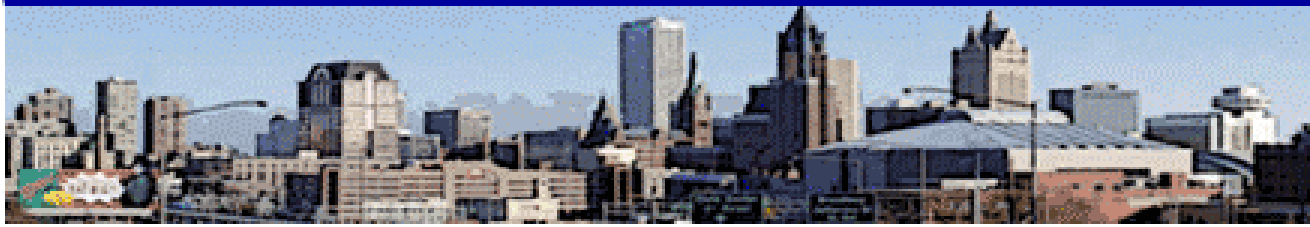

Socio-Economic Impact Analysis of the Preliminary Draft of the Regional Housing Plan by Southeastern Wisconsin Regional Planning Commission

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What is a socio-economic impact analysis?

- A tool to determine whether or not a proposed development will have a negative or positive impact on
  - Social, Economic, Environmental, and Fiscal well-being of a community (current and future residents)
  - In particular Environmental Justice (EJ) populations
- A two-fold process
  - Quantitative Measures
    - Facts or conditions
    - Trends and Projections
  - Public Outreach
    - Public Feedback
    - Identify issues that are not easily quantifiable
    - Meetings to be held in October/November

Strategy for Socio-Economic Impact Analysis of Regional Housing Plan

- There are a total of 47 Recommendations from the Preliminary RHP focus in on 6 housing plan categories:

Fair Housing/Opportunity
5

Subsidized and Tax Credit Housing
10

Job/Housing Balance
10

Affordable Housing
10

Housing Development Practices
5

Accessible Housing
7

- *Affordable Housing is central to the RHP*

Strategy for Socio-Economic Impact Analysis of Regional Housing Plan

- Key Objectives Identified for each of the six major housing categories
  - **Key Objective (Affordable Housing):** *Increase distribution of lower-cost housing options in sewered areas throughout the seven county Region*
  - **Key Objective (Fair Housing/Opportunity):** *Increase housing options for low-income and minority residents throughout the seven county Region*
  - **Key Objective (Job/Housing Balance):** *Increase affordable housing options in municipalities in proportion to number of moderate and low wage jobs in a given municipality and increase job opportunities near concentrations of existing affordable housing*
  - **Key Objective (Accessible Housing):** *Increase housing options for persons with disabilities throughout the seven county Region, including near major employment centers*
  - **Key Objective (Subsidized and Tax Credit Housing):** *Increase the supply and distribution of subsidized and tax credit housing throughout the seven county Region*
  - **Key Objective (Housing Development Practices):** *Incorporating housing best management practices into planning and design, to lower the long-term cost of housing and provide safe and healthy neighborhoods throughout the seven county Region*

Strategy for Socio-Economic Impact Analysis of Regional Housing Plan

- Evaluating the 47 Recommendations in the context of a SEI analysis
  - Evaluation based on:
    - Historic trends and future socio-economic indicators and projections
    - Literature & Research Review (academic & journalistic) on role of Great Recession and housing crisis on region and US housing market
    - Data (American Housing Survey, Census, foreclosure, and so on……)
  - And within the context of:
    - U.S. Federal Department of Housing & Urban Development (HUD) laws, Fair Housing Laws and Regulations
    - State of Wisconsin Fair Housing Laws and Regulations
    - Federal State, County, and Local policies and programs
    - Local and county plans (comprehensive), and other regional plans and
    - Local and county zoning codes and ordinances
    - Design including Uniform Building Code, Universal Design (UD), and Visitability features

Strategy for Socio-Economic Impact Analysis of Regional Housing Plan

- Tools as a method for organizing the recommendations:
  - Tools that Impact the Costs of Development and Housing Prices:
    reduce the cost of the physical construction of, or the regulatory costs associated with housing unit development
  - Tools that Impact Design, Aesthetics, and Safety
    changes to existing design, aesthetic, and safety guidelines that would support improvements in affordable housing
  - Tools that Impact Policy and Zoning
    changes to housing or land use policies or zoning taking into consideration whether or not could have a disproportionate impact on environmental justice communities
  - Tools that Impact Planning and Programs
    changes to local, county, or regional plans or housing programs that impact affordable housing
  - Tools that Impact Education and Outreach
    programs or methods that would promote housing education to the public, community leaders, public officials, planners, and other decision-makers
  - Tools that Impact Socio-Economic Barriers
    opening up housing opportunities in areas of the Region that were otherwise closed off including many of the Region's suburbs and exurbs

Chapter Outline Template

- Introduction
- Summary of Preliminary Regional Housing Plan Category
  - Legacy (1975) Regional Housing Plan – summarized the recommendations related to the specified housing plan category
    - Identified whether or not the recommendations were implemented or not
  - Summary of the preliminary Regional Housing Plan relative to the specified housing plan category
- Rationale
  - Provides a discussion of the specified housing plan category in relation to:
    - Great Recession, the Housing Crisis, Other Planning Issues and Impact on Environmental Justice Communities
  - A discussion in light of the American Planning Association's Policy Guide on Housing
- Preliminary Regional Housing Plan Category Recommendations
- Analysis of Planning Category Recommendations
  - Key Objective Identified
  - Tools analysis and discussion
- Summary

Key Findings: RATIONALE

- Key Points
  - Impacts of Great Recession and Housing Crisis
    - And on Environmental Justice Communities
    - *Research and trends indicate that all signs point to an increasing need for affordable housing, particularly for multifamily units*
    - *Demand at all income levels is increasing multifamily unit rents, making affordable multi-family even more scarce as supply dwindles*
    - *Replacement/development of higher end units is not "trickling down" to mid- to lower-income renters and lower-end units (both subsidized/tax credit or market rate) are not being developed*
  - Impacts of Projected Demographic Changes
    - Aging of the population
    - Decline of household incomes
  - Impacts of Segregation and Discrimination
  - Impacts of Job/Housing Imbalances
  - Impacts of Spatial Mismatch and Transit

Key Findings: Affordable Housing

- The RHP identifies its related *plan objective* as the following:
  - *Provide decent, safe, sanitary, and financially sustainable housing for all current residents of the Region, and the Region's anticipated future population.*

- RHP definition of Affordable Housing borrows from HUD definition:
  - *all households within the Region should be able to obtain decent, safe, and sanitary housing at a cost of no more than 30 percent of their household income, and therefore the key quantitative measure of the Region's projected housing need is based on affordability determined by comparing housing costs to household income.*

- CED's Key Objective: *Increase distribution of smaller homes and higher-density housing options in sewered areas throughout the seven county Region*

Key Findings: Affordable Housing

- ***Tools that Impact the Costs of Development and Housing Prices***
- *Applies to Recommendations: 1, 3, 4, 5, 8, 9, 10*
- Summary: Costs per unit are reduced in order to provide a reduction in cost to the consumer, therefore these tools are likely to have a positive impact on environmental justice communities by providing greater opportunity and incentives to increase the stock of affordable single- or multi-family units, and for purchasing or renting units at a more affordable price
- Recommendations 1, 3, 4, and 5 focus on the impact that regulatory changes could have on reducing the overall size of the housing unit or development has on costs.
- Recommendation 8 calls for shoring up problems in the lending side
- Recommendation 9 calls for a change in the method in which properties are appraised to incorporate costs, revenues, and sales comparisons* (needs more research to see if lower-cost housing units are being overly appraised)
- Recommendation 10 exposes the opportunity that, upon TIF closeout, at least 75% of the tax revenue of the final year could go towards funding affordable or subsidized housing. Ideally, all communities with job/housing imbalances would support this as an opportunity to increase the affordable housing stock.

Key Findings: Affordable Housing

- ***Tools that Impact Design, Aesthetics, and Safety***
- *Applies to Recommendations: 5 and 6*
- Summary: recommendations focus on alleviating the impacts that design have on the costs associated with affordable housing, therefore lowering the costs.
- Each of the subparts to Recommendation 5, including elimination of size and exterior (masonry) requirements, allowance for panelized housing construction practices, etc, all focus on driving down the costs of the review process as well as the actual construction; ultimately, it is inferred that these savings would be passed along to the consumer.
- Recommendation 6 mandates the presence of an architect on an architectural or design review board for any residential development could enhance or streamline the process, and possibly reduce developer costs that could result in savings for the consumer.

Key Findings: Affordable Housing

- ***Tools that Impact Policy and Zoning***
- *Applies to Recommendations: 1, 2, 3, and 4*
- Summary: recommendations focus on whether or not proposed policies and/or zoning changes could have a disproportional impact on environmental justice communities
- Policies:
  - Recommendation 3 reiterates State law that allows impact fees to be reduced or waived for the low-cost housing developments that meet home and lot size thresholds. Given that this is already policy, it appears that it may actually have no impact on development of affordable housing in suburban and exurban areas, and therefore unlikely to have much of an impact on environmental justice communities
  - Recommendation 2: Jury is still out! States that the Governor and State Legislature should develop a new funding strategy that would eliminate or reduce the heavy reliance of municipal and school district funding on property taxes – implies other tax sources (sales or income) .
    - It is a fundamental problem, but alternatives seem weak.
- Zoning:
  - Recommendations 1 and 4 discuss setting zoning thresholds or allowing more flexible zoning strategies that would allow for the development of smaller single-family homes and more multi-family housing. These would positively impact ej communities

Key Findings: Affordable Housing

- ***Tools that Impact Planning and Programs***
- *Applies to Recommendations: 4 and 6*
- Summary: recommendations focus on changes in local/county/regional plans and programs that would encourage affordable housing or promote savings within the development process that could ultimately be passed along to the consumer
- Recommendation 4 calls for comprehensive plans to encourage a wider variety of housing styles and neighborhood designs in order to provide a wider variety of housing choices
- Recommendation 6 calls for the inclusion of professional architects on local design review boards so that they can provide expertise and therefore possible minimize the costs associated with multiple concept plan submittals. This recommendation is not likely to have a significant impact on ej communities.

Key Findings: Affordable Housing

- ***Tools that Impact Education and Outreach***
- *Applies to Recommendation 7*
- Summary: recommendation focuses on programs or methods used by either SEWRPC or other regional or state housing agencies that would promote housing education to both the public as well as to official local or county decision-makers, including planners and politicians.
- Recommendation 7 states that education and outreach efforts should be conducted throughout the Region regarding the need for affordable housing and subsidized housing. Based on the projected needs assessment set forth in Chapter XII and the warnings provided in the Harvard housing studies, CED strongly encourages. Implementation of this recommendation could have a positive impact on environmental justice communities, if it leads to more development of affordable housing units (particularly rental units) and to a wider distribution of subsidized or tax credit housing. Local officials need to be aware of the economic realities facing their communities; given the need for more housing aimed at lower-income households (both market rate and subsidized), they need to be provided with the tools necessary to combat public opposition.

Key Findings: Fair Housing/Opportunity

- The RHP identifies fair housing issues as two of the seven components contributing to the Regional housing problem:
  - Housing discrimination
  - Concentration of low-income and minority populations in the Region's central cities
- CED's Key Objective: *Increase housing options for low-income and minority residents throughout the seven county Region*

Key Findings: Fair Housing/Opportunity

- ***Tools that Impact Policy and Zoning:***
- *Applies to Recommendations 1 and 2*
- Summary: Recs 1 and 2 deal with the review and evaluation of zoning requirements and designated districts for the purpose of providing access for low-income and renter households to affordable housing.
- Recommendation 1 specifies that zoning policies be reviewed and adjusted accordingly to consider additional multi-family housing, or accommodate affordable single-family housing so that additional units of affordable housing might be possible. Housing discrimination in zoning and land use may occur with policies that prescribe density requirements including lot and dwelling size therefore minimizing the requirements would likely have a positive impact on EJ communities. Overlaps with Recommendation 1 of the Affordable Housing section.
- Recommendation 2 addresses problems with discrimination that can arise under the conditional use process (CUP). Implementation of Rec 2 would remove CUP as a barrier by allowing multi-family housing development as a principle use, and therefore would have a positive impact on EJ communities.

Key Findings: Fair Housing/Opportunity

- ***Tools that Impact Planning and Programs***
- *Applies to Recommendations: 1, 3, and 5*
- Summary: these recommendations foster the promotion of fair housing goals through local planning and implementation of programs, it is likely that each of these recommendations, if implemented, would have a positive impact on environmental justice communities within the Region.
- Recommendation 1 calls for the review of comprehensive plan recommendations to determine if their plans and zoning requirements act to further fair housing
- Recommendation 3 calls for sub-grantees of CDBG, CPD, and HOME funds to certify that they will work to further fair housing
- Recommendation 5 calls for the development of an Assisted Housing Mobility Program that would help reduce the high concentrations of minorities in high-poverty central city neighborhoods by providing assistance in making the transition to less impoverished areas. This recommendation is on hold pending more details – as stated, it would be either a county or community level program, and/or it could be established as part of a regional voucher program.

Key Findings: Fair Housing/Opportunity

- ***Tools that Impact Education and Outreach***
- *Applies to Recommendation: 4*
- Summary: focus on programs or methods used by either SEWRPC or other regional or state housing agencies (WHEDA) that would promote housing education to both the public as well as to official local or county decision-makers including planners and politicians.
- Recommendation 4 maintains that funding should be made available for continued community outreach, awareness and education, and advocacy aimed at issues relating to fair housing rights, anti-discrimination laws and access to legal support for accountability and enforcement. This is probably one of the most critical recommendations set forth to further fair housing policies and would be most beneficial for members of environmental justice communities and their advocates in order to redress criminal discriminatory activity.

Key Findings: Job/Housing Balance

- The RHP identifies job/housing imbalances as one of the seven components contributing to the Regional housing problem:
  - A job/housing imbalance within sub-areas of the Region and the Region as a whole, particularly an adequate supply of affordable or "workforce" housing near employment centers
- CED's Key Objective: *Increase affordable housing options in municipalities in proportion to number of moderate and low wage jobs in a given municipality and increase job opportunities near concentrations of existing affordable housing*

Key Findings: Job/Housing Balance

- ***Tools that Impact the Costs of Development and Housing Prices***
- *Applies to Recommendation: 1 (a and b)*
- Summary: Recommendation 1, parts a and b, aims at reducing the costs of development and housing prices in order to provide more housing options, and likely more affordable housing, to subareas in the Region where there have been significant job/housing imbalances.
- Rec 1 would have positive social and economic benefits for environmental justice communities, given that increasing housing options within many of the subareas that currently have a Type 1 and/or Type 2 job/housing imbalance. Whether or not environmental justice communities would have a proportionally significant or higher share of benefits from additional affordable housing depends on how extensively the recommendation is implemented throughout the Region. As stated by the APA, in order to see any major positive impacts, there would have to be considerable buy-in by most, if not all, of the communities with Type 1 and Type 2 imbalances.

Key Findings: Job/Housing Balance

- ***Tools that Impact Policy and Zoning***
- *Applies to Recommendations: 1 (a and b), 4, and 5*
- Summary: Recommendations 1, 4, and 5 would help rectify job/housing imbalances throughout the Region and therefore could positively impact environmental justice communities.
- Under Recommendation 1, an increased provision of affordable housing (either single- or multi-family units) is targeted to areas that are currently lacking in affordable housing (Type 1 or Type 2 imbalances), and would require a change in zoning for specific communities.
- Recommendations 4 and 5 incentivize affordable housing by addressing job/housing imbalances through existing economic development tools. Recommendation 4 calls for amending TIF law to require the incorporation of affordable housing, this would ensure that the development of further imbalances would be minimized in outlying areas. Recommendation 5 calls for job/housing balances as a criterion for other State economic development incentives. TIF is probably the most widely used tool for ED so Recommendations 4 and 5 would likely have a huge impact.

Key Findings: Job/Housing Balance

- ***Tools that Impact Planning and Programs***
- *Applies to Recommendations: 2, 3, 6, 7, 8, 9, and 10*
- Summary: these recommendations are divided into three areas; transit, strategic planning, and program development.
- *Transit*: Recommendations 2 and 7 focus on programs that would improve access to jobs through improvements in transit service. Full implementation (Regional Transit Plan) would provide significant and disproportionately high social and economic impacts to EJ populations, particularly to those that rely on public transit for access to jobs.
- *Strategic Planning*: Recommendations 3, 6, and 8 focus on developing and incorporating job/housing balance analyses into strategic planning by public agencies.
  - Recommendation 6 states that SEWRPC will provide communities the findings from the job/housing balance analysis when they request sewer service area expansion amendments, but it does not incentivize the process, therefore, likely no impact
  - Discussion on Rec 8 is forthcoming…….
- *Program Development:* Recommendations 9 and 10 would require the development of specific programs aimed at co-locating housing with employment. Rec 9 is a positive workforce development strategy and both recommendations would positively impact EJ communities.

Key Findings: Accessible Housing

- As stated in Chapter II of the preliminary RHP, developing an adequate supply of accessible housing was identified as one of the seven components contributing to the Regional housing problem:
  - A need for accessible housing stock to accommodate persons with disabilities
- CED's Key Objective: *Increase housing options for all persons with disabilities throughout the Region*

Key Findings: Accessible Housing

- ***Tools that Impact the Costs of Development and Housing Prices***
- *Applies to Recommendations: 2, 3, and 4*
- Summary: aimed at reducing the cost of the physical construction of the development, the costs of accessible modifications and retrofits, and at reducing the regulatory costs associated with accessible housing development. Each of these recommendations would have a positive impact on persons with disabilities
- Recommendation 2 directs local governments to 'support efforts' by developers to incorporate design features that increase accessibility or Visitability for persons with disabilities.
- Recommendation 3 directs the State to continue funding for a series of Long Term Care programs. These provide a major funding source for home modifications which allow persons with disabilities to remain in their homes.
- Recommendation 4 states that public funding should be maintained for Independent Living Centers (ILCs) to continue providing services to persons with disabilities.

Key Findings: Accessible Housing

- ***Tools that Impact Design, Aesthetics, and Safety***
- *Applies to Recommendations: 2 and 7*
- Summary: changes to existing design, aesthetic, and safety guidelines that would support improvements in accessible and affordable housing, and would therefore have a positive impact on persons with disabilities
- Recommendation 2 directly considers the specific design features that would improve access for persons with disabilities to determine how design features are constructed in an accessible and more universal manner.
- Recommendation 7 would expand resources for providing modifications to renters that would allow persons with disabilities to age in place.

Key Findings: Accessible Housing

- ***Tools that Impact Policy and Zoning***
- *Applies to Recommendations: 2 and 6*
- Summary: focuses on whether or not the legal ramifications behind proposed policies and/or zoning changes could have a disproportional impact on EJ communities or persons with disabilities.
- Recommendation 2 considers some of the design aspects of improving access for persons with disabilities that may require flexibility or changes to zoning ordinances or building codes. (Awaiting clarification on the extent of implementation….)
- Recommendation 6 highlights education and training of code enforcement officials who would be working in the field to help keep builders accountable for accessibility improvements and modifications and to ensure that local zoning ordinances and codes are in compliance. This will likely have a positive impact on environmental justice communities and persons with disabilities, given that compliance would likely increase the number of accessible units throughout the Region.

Key Findings: Accessible Housing

- ***Tools that Impact Planning and Programs***
- *Applies to Recommendations: 1, 3, 5, and 7*
- Summary: addresses changes to planning tools or programs that impact accessible housing. Given that each of the recommendations fosters the promotion of accessible housing goals, it is likely that each of these recommendations would have a positive impact on EJ communities and persons with disabilities
- Recommendation 1 discusses incorporation of additional accessible housing into the local or county comprehensive plan by realigning it with the goals set forth to address job/housing imbalances and affordable housing needs.
- Recommendations 3 and 5 focus on improving the quality of available data for understanding the needs of persons with disabilities. Rec 3 specifically calls for the development of a database to track the accessible housing inventory, including housing that receives grants for modifications. Most private homes with modifications are no
- Recommendation 7 focus on changes to existing programs that support resources for persons with disabilities that would likely improve the services being provided and broaden the scope of funding for modifications.

Key Findings: Accessible Housing

- ***Tools that Impact Education and Outreach***
- *Applies to Recommendation: 6*
- Summary: Recommendation 6 focuses specifically on code compliance and enforcement, and calls for education and training for local government employees and code enforcement officials who will work in the field to help maintain accountability, code compliance, follow up for accessible housing modifications or UD/Visitibility improvements.
- Recommendation 6 would lead to greater compliance in accessible housing modifications and therefore the quality of accessible housing would improve.

Key Findings: Accessible Housing

- ***Tools that Impact Socio-Economic Barriers***
- *Applies to Recommendations: 1, 2, 3, 4, 5, and 7*
- Summary: focus on opening up housing opportunities in areas of the Region that were otherwise closed off including many of the Region's suburbs and exurbs.
- Recommendations 1 and 2 would likely provide a wider selection of accessible housing stock throughout the Region particularly in those subareas and communities identified. This would have a disproportionately positive impact on environmental justice populations, particularly persons with disabilities.
- Recommendations 3, 4 and 7 each support resources and programming that would impact environmental justice populations such as persons with disabilities and the elderly by providing them continued or increased access to services and possible financial support.
- Recommendations 3 and 5 would contribute by providing a greater overall knowledge base of the accessible housing stock in the Region. This will help local level planners, elected officials, decision makers, housing advocates, and other advocates make better, more-informed decisions to support the housing needs for persons with disabilities.

Key Findings:
Subsidized Tax Credit Housing

- As stated in Chapter II of the preliminary RHP, developing and maintaining an adequate supply of subsidized housing was identified as 1 of the seven components contributing to the Regional housing problem:
  - Challenges faced in sustaining the present supply of subsidized housing stock in the Region
- CED's Key Objective: *Increase distribution of subsidized housing units throughout the Region*

Key Findings: Subsidized Tax Credit Housing

- ***Tools that Impact the Costs of Development and Housing Prices***
- *Applies to Recommendations: 1, 2, 3, 4, 6, and 9*
- Summary: aimed at reducing the costs of the physical construction of the development or at reducing the regulatory costs associated with development. In this case, the recommendations are also aimed at reducing the costs of programming, such as those associated with the costs of running subsidized housing programs or directing tax credits towards more efficient uses.
- *Reducing overhead costs*:
  - Recommendations 1 and 6 both call on supporting more efficient and likely cost-effective uses of federal resources. Cutting administration costs while maintaining current funding levels for the Region's PHAs would provide more support for low-income tenants, and therefore would benefit environmental justice communities greatly within the Region. Removing the financial disincentives for administering vouchers on a regional basis through a Regional PHA would streamline the voucher process and cut down considerably on administrative costs. For this to be effective, however, funding would need to be maintained *at least* at current levels so that more low-income households can be served or could participate in either the public housing or voucher program.

Key Findings: Subsidized Tax Credit Housing

- *Increased funding*:
  - Recommendations 1, 2, and 4 focus specifically on maintaining or increasing the funding levels for federal housing programs; increasing the funding levels throughout the Region would undoubtedly have a positive impact on environmental justice communities. Given the state of the national economy, as well as the political environment in Congress, maintaining current federal funding levels will likely only be feasible at least in the near term.
- *Utilization of LIHTC:*
  - Recommendations 3, 4, and 8 encourage the use of LIHTC particularly in priority areas; specifically, these recommendations focus on lowering the direct costs associated with developing affordable public housing units through the use of tax credits and therefore would likely increase the available affordable multi-family unit housing stock.
  - Recommendation 9 focuses on the indirect costs associated with development or redevelopment such as parcel assemblage, brownfield remediation, and discounting publicly-owned lands. The actual costs would be absorbed by other public entities (local communities would likely absorb parcel assemblage while brownfield remediation costs might be local, state, or even federal if grants are applicable).

Key Findings: Subsidized Tax Credit Housing

- ***Tools that Impact Policy and Zoning***
- *Applies to Recommendation: 7*
- Summary: changes to the legal implications of housing policies or zoning. The evaluation focuses on whether or not the legal ramifications behind proposed policies and/or zoning changes could have a disproportional impact on environmental justice communities. This includes all recommendations that impacts laws, policies, and zoning at state, county, and local levels.
- Recommendation 7 states that the Wisconsin Open Housing Law (Section 106.50 of the Wisconsin Statutes) should be amended to recognized housing vouchers as lawful sources of income. Housing Choice Vouchers have a monetary value and therefore should be considered income for the recipients, so that private landlords would not be able to dismiss a voucher tenant based solely on their actual income.
- Recommendation 7 requires further analysis and discussion in light of tax consequences, and also for applications for LIHTC units……..

Key Findings: Subsidized Tax Credit Housing

- ***Tools that Impact Planning and Programs***
- *Applies to Recommendations: 1, 2, 3, 4, 5, 6, 8, 9, 10*
- Summary: Given that each of the recommendations fosters the promotion of subsidized and tax credit goals, and tangentially, fair housing goals through local planning and implementation of programs, it is likely that each of these recommendations, if implemented, would have a positive impact on environmental justice communities within the Region.
- *Local Programming:*
  - Recommendations 1, 2, 3, 4, 6, and 9 concern local level changes or improvements in local PHA programs, including streamlining programs, working with HUD to improve efficiencies within the existing programs, maintain funding levels, secure funding that would provide greater housing opportunities region-wide, and investigate and implement new methods for encouraging more private or non-profit development.

Key Findings: Subsidized Tax Credit Housing

- *State and Regional Programming:*
  - Recommendation 5 states that WHEDA should study other models to determine a better method for identifying extremely-low income households in order to incorporate those persons into the QAP.
  - Recommendation 8 states that WHEDA should revise its LIHTC allocation criteria to award points to non-elderly developments (Category 8) and to address job/housing imbalances in suburban communities. Additionally, given the backlash that many suburban communities have exhibited toward LIHTC developments in the Region, it should eliminate the criteria on local support (Category 3).
  - Recommendation 10 calls for the establishment of a Regional Housing Trust Fund for Southeastern Wisconsin. A Government Accountability Office report to Congress strongly advises streamlining efforts in order to identify and remove inefficiencies, and given that the funding levels of subsidy programs are unlikely to increase anywhere in the near future, a Regional Housing Trust Fund that can streamline the process for development of multi-unit housing, that can remove the administrative burdens and redundancies that likely exist across different PHA programs, that can spread the funding burden across multiple jurisdictions, and can raise the profile in order to attract more private investment would indeed benefit the Region's environmental justice communities. Warrants further discussion with EJTF

Key Findings: Subsidized Tax Credit Housing

- **FORTHCOMING:**
  - Analysis of Housing Development Practices
  - CED website will be updated mid-September with draft chapters and newsletter on review of recommendations
  - Presenting preliminary findings to Housing Task Force (early October)
  - Public Outreach component (meetings throughout the Region in October/November)
  - Assimilating public comments and task force feedback into SEI
  - Presenting additional findings to the EJTF in December
  - Final Draft Completed January 2013

Thanks for your input!

- Questions and Comments:

- Website with the preliminary draft chapters for the SEI is forthcoming in mid-September

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