## NEG CASE

**We negate**

**Resolved:** The United States should promote the development of market rate housing in urban neighborhoods

**Our First Contention is LIHTC**

Also known as the Low-Income Housing Tax Credit

In absence of market-rate housing, the U.S is most feasibly going to further already existent government programs. **The OCC 14 explains[[1]](#endnote-1)** that the Low-Income Housing Tax Credit, also referred to as LIHTC, is the federal government’s primary program for encouraging the investment of private equity in the development of affordable rental housing for low-income households. It functions by providing tax incentives to encourage individual and corporate investors to invest in the development, acquisition, and rehabilitation of affordable rental housing. **The New York Times reported in 2012[[2]](#endnote-2)** that 90 percent of the affordable housing that is built within the United States is with LIHTC.

**LIHTC is crucial for 2 reasons**

**First, Disaster Relief**

**Novogradac 17 explains[[3]](#endnote-3)** that community development tax credits have again been proposed to help finance the rebuilding after hurricane Harvey. In fact, these credits repeated and widespread value in disaster recovery has led many to propose making additional tax credit allocations for presidentially declared disaster areas a permanent part of the tax code. **The New York Times quantifies[[4]](#endnote-4)** that after Hurricanes Katrina and Rita, the credits were used to finance about 27,000 affordable homes and apartments in the affected states. We need LIHTC now more than ever as **The Public Health Institute finds[[5]](#endnote-5)** that climate change is intensifying the severity of these storms, thus doing even more property damage now and in the future.

**Second, Affordable Housing**

Affordable housing must be built as luxury housing starts to flood the market. Luxury developments are often built in urban neighborhoods which **Cortright**[[6]](#endnote-6) **explains**, experience vastly hire demand for real estate. **Boles[[7]](#endnote-7) 16** **explains** that luxury development in high demand areas, creates a feedback loop where the demand only grows as the neighborhood becomes more economically successful incentivizing more building, culminating in a cycle of rapid price increase. Because of this, high demand areas like San Francisco experienced a 60% rise in median income from 1996 to 2015 but a 398% increase in median housing costs, pushing out the poor and padding the pockets of the rich. Luxury developments attract wealthy buyers and in doing so, **Chew** explains raise the cost of surrounding daily expenses because businesses and renters alike know they can charge more for their services, punishing the area’s low-income residents. Ultimately, **Glaser[[8]](#endnote-8)** quantifies that a 1% rise in labor demand increases housing prices by $19,000.

**[SOLVENCY]**

Luckily, **The HUD finds[[9]](#endnote-9)** through a meta-analysis of over 11-thousand properties that a vast majority of LIHTC housing remained affordable past the 30-year period of required governmental regulation. In fact, **they further** that half of properties had lower rates than the LIHTC restriction, and another 9 percent within a 5 percent price margin of the restricted ceiling. **The OOC 14 concludes** that LIHTC has provided affordable prices to over 2.4 million low-income households.

**The Impacts are two-fold**

**First, Cyclical Poverty**

**Chew** determines that market-rate housing fuels mass displacement of low-income residents as they can no longer afford to live in the area, forcing them to relocate. Indeed, neighborhoods experiencing luxury influx, generate 300% more working-class displacement compared to other areas. Ultimately, **Chew** concludes, since 1990 the stock of luxury real estate has grown significantly but on balance, we have lost over 2.5 million affordable housing units. Affordable housing is crucial as **Poethig[[10]](#endnote-10)** continues that families with stable, affordable housing are alleviated from the typical rent burden allowing for far greater access to education, food and healthcare, which is why **Cunningham[[11]](#endnote-11)** finds that reducing the rent burden of the impoverished could reduce childhood poverty by 21%

**Second, is Disaster Relief**

**Aurand 18 finds[[12]](#endnote-12)** that if the histories of past storms are repeated, low-income families and renters would be disproportionately impacted and will have a more difficult time recovering because their often-limited resources. **Aurand furthers** that nearly 280,000 very low-income renter households reside in regions where hurricane, storm surge, or tropical storm alerts have been issued. Thus, it is crucial that LIHTC is able to mitigate the effects of the next natural disaster

**Thus,**

**We urge you to negate**

## AT: Framework

### **ATAT: Structural Violence**

Negating creates a clear link into structural violence as **Washington 18 finds[[13]](#endnote-13)** that natural disasters effect minority and disadvantaged communities the most. This is crucial as the affirmative simply ignores these people’s existence in the case of natural disaster, whereas LIHTC creates tens of thousands of affordable housing units to provide real relief.

## FRONTLINES

### **ATAT: 30 Year Affordability**

1. **The HUD finds[[14]](#endnote-14)** through a meta-analysis of over 11-thousand properties that a vast majority of LIHTC housing remained affordable past the 30-year period of governmental regulation. In fact, **they further** that half of properties had lower rates than the LIHTC restriction, and another 9 percent within a 5 percent price margin of the restricted ceiling. **The study concluded** that the LEAST common outcome after the 30-year period was a switch to market-rate housing

### **ATAT: LIHTC Segregation**

1. **Kimura finds[[15]](#endnote-15)** that the Center for Housing and Urban Development issued a new rule in response to the lawsuit. The rule formalized the use of the disparate impact theory under the Fair Housing Act. It is logical that a lawsuit makes a difference, because you are being legally forced to abide by the settlement.

### **ATAT: Tax Cuts Hurt Funding**

1. This argument is entirely dependent on the tax cut act to be permanent. Corporate taxes fluctuate constantly between administrations so the funding could easily return to its previous rates. Keep in mind, the LIHTC policy has been in existence through multiple tax reforms and it remains the best solution to the housing crisis

### **ATAT: Doesn’t Help Poor**

1. **The OOC 14 indicates** that LIHTC has provided affordable prices to over 2.4 million low-income households. If 2.4 million low-income citizens is not helping the poor, then what is?
1. <https://www.occ.gov/topics/community-affairs/publications/insights/pub-insights-mar-2014.pdf>

**The Low-Income Housing Tax Credit (LIHTC) is the federal government’s primary program for encouraging the investment of private equity in the development of affordable rental housing for low-income households.** Since its creation in 1986, the LIHTC has helped to finance more than 2.4 million affordable rental-housing units for low-income households.1 This Insights report describes how LIHTCs are used to finance the development of affordable housing and how national banks and federal savings associations (collectively, banks) can participate as investors and lenders in LIHTCfinanced projects. The report outlines the risks and regulatory considerations of LIHTC investments, including the considerations these investments receive in Community Reinvestment Act (CRA) examinations.

…

**The LIHTC program provides tax incentives to encourage individual and corporate investors to invest in the development, acquisition, and rehabilitation of affordable rental housing**.2 The LIHTC is an indirect federal subsidy that finances low-income housing. This allows investors to claim tax credits on their federal income tax returns. The tax credit is calculated as a percentage of costs incurred in developing the affordable housing property, and is claimed annually over a 10-year period. Some investors3 may garner additional tax benefits4 by making LIHTC investments.5 The equity raised with LIHTCs can be used for newly constructed and substantially rehabilitated and affordable rental-housing properties for low-income households, and for the acquisition of such properties in acquisition/rehabilitation deals. LIHTCs provide equity equal to the present value of either 30 percent (referred to in this report as the 4 percent credit) or 70 percent (referred to as the 9 percent credit) of the eligible costs of a low-income housing project, depending in part on whether tax-exempt bonds are used to finance the project. [↑](#endnote-ref-1)
2. <https://www.nytimes.com/2012/12/21/opinion/a-tax-credit-worth-preserving.html?_r=0&mtrref=undefined>

Created by Congress in 1986, the credit is available to investors prepared to sink money into new or rehabilitated low-income housing. It **is responsible for about 90 percent of all the affordable housing that is built in this country, and has provided more than 2.5 million rental units since its inception.** It also produces as many as 100,000 jobs each year. The system is especially useful in times of disaster. After Hurricanes Katrina and Rita, for example, the credits were used to finance about 27,000 affordable homes and apartments in the affected states. This same mechanism could be extremely useful in the wake of Hurricane Sandy. Despite its success, the tax credit program has not by itself kept pace with the burgeoning need. Recent statistics show, for example, that about 8.5 million low-income families are now spending more than half of their income on rent or living in hazardous, substandard housing. Beyond that, federal rental assistance programs reach only about a quarter of eligible families. [↑](#endnote-ref-2)
3. Michael **Novogradac**, 10-2-**2017**, "Tax Credit Programs Show Value during Natural Disaster Recovery," **Novoco**, <https://www.novoco.com/periodicals/articles/tax-credit-programs-show-value-during-natural-disaster-recovery>

Virgin Islands and Florida. As they were following Hurricane Katrina and the 2008 Midwestern storms, **community development tax credits have again been proposed to help finance the rebuilding. In fact, these credits’ repeated and widespread value in disaster recovery has led many to propose making additional tax credit allocations for presidentially declared disaster areas a permanent part of the tax code.** Significantly, legislators reintroduced **the National Disaster Tax Relief Act** in the wake of Hurricane Harvey and pending Hurricane Irma, which would enact several provisions for recent years. The bill (H.R. 3679) **included a provision to increase the low-income housing tax credit (LIHTC) ceiling by the greater of $8 multiplied by the population of the qualified disaster area or 50 percent of the state housing credit ceiling for federally declared disaster areas during calendar years 2012 to 2015**. It also called for a special new markets tax credit (NMTC) annual allocation increase of $500 million to community development entities (CDEs) serving any covered federally declared disaster area for each calendar year of 2012 to 2015. Furthermore, it would provide a special $10 billion allocation of tax-exempt continued on page 2 bonds for affected areas for disaster during 2012-2015. Meanwhile, the federal historic tax credit (HTC) would jump to a 13 percent credit for rehabilitation of nonhistoric buildings placed in service before 1936 and a 26 percent credit for certified rehabilitations of a certified historic structure, respectively, within federally declared disaster areas during 2012 to 2015. That’s a 30 percent increase in the rate for each. If those provisions sound familiar, it’s because they mirror what Congress issued in response to hurricanes Katrina, Rita and Wilma in 2005. In that legislative example, **disaster-affected areas received increases in the allocation of LIHTCs**, HTCs and NMTCs, in addition to other tax benefits. **That arrangement has since repeated. Similar legislation was enacted to address the Midwestern floods in 2008.** However, the use of tax credit allocation increases isn’t automatic. Famously, although it provided disaster recovery grants, Congress didn’t enact disaster tax credit relief to areas hit by Hurricane Sandy in 2012. Hurricane

 [↑](#endnote-ref-3)
4. No Author, 12-20-**2012**, " A Tax Credit Worth Preserving," **The New York Times**, <https://www.nytimes.com/2012/12/21/opinion/a-tax-credit-worth-preserving.html?_r=0&mtrref=undefined>

Lawmakers interested in simplifying the corporate tax code must take care to protect **the low-income housing tax credit**, which allows corporations to reduce their tax liabilities by investing in affordable housing. Without it, affordable-housing construction, which already falls far short of the need, would quickly grind to a halt. Created by Congress in 1986, the credit is available to investors prepared to sink money into new or rehabilitated low-income housing. It is responsible for about 90 percent of all the affordable housing that is built in this country, and has provided more than 2.5 million rental units since its inception. It also produces as many as 100,000 jobs each year. The system **is especially useful in times of disaster.** **After Hurricanes Katrina and Rita, for example, the credits were used to finance about 27,000 affordable homes and apartments in the affected states**. This same mechanism could be extremely useful in the wake of Hurricane Sandy. Despite its success, the tax credit program has not by itself kept pace with the burgeoning need. Recent statistics show, for example, that about 8.5 million low-income families are now spending more than half of their income on rent or living in hazardous, substandard housing. Beyond that, federal rental assistance programs reach only about a quarter of eligible families. The rental programs must be enlarged, and the credit itself improved by focusing it more closely on needy areas and on the neediest families — those who earn only 30 percent of average median income in their area — while at the same time encouraging mixed-income developments. [↑](#endnote-ref-4)
5. Jennifer **Scroggins**, 11-15-**2017**, "Climate Change is Making Natural Disasters Worse, and More Likely. How Do We Protect the Most Vulnerable?," **The Public Health Institue**, <http://www.phi.org/news-events/1339/climate-change-is-making-natural-disasters-worse-and-more-likely-how-do-we-protect-the-most-vulnerable>

**Greenhouse gas emissions have driven the global average temperature higher for more than a century.** Three years ago, 2014 set the record for hottest year ever recorded; temperatures the next year soared significantly above those levels, and again in 2016. “Climate change has introduced unprecedented rates of change for anything that we've been able to measure or recreate,” says LeRoy Westerling, Professor of Management of Complex Systems and Co-Director of the Center for Climate Communication at UC-Merced. “You have two dials: one controls how much precipitation is going in, and that’s getting more variable and maybe slightly increasing over time on average,” Westerling explains. **“And the other is the temperature, and that's mostly going in one direction—it’s getting warmer—and that’s increasing the evaporation coming out.” This means a drying landscape with more flammable fuel—increasing the odds of disastrous firestorms and droughts, even in some areas that haven’t historically been fire-prone.** “We’re seeing Northern California, as it dries out, is acting more like Southern California. It’s becoming more and more common here that we're having fire weather,” explains Bill Stewart, Co-Director of the UC Berkeley Center for Forestry and Center for Fire Research and Outreach. “It seems like we're living in a county that’s one or two counties south every decade in terms of fire behavior.” **Burning of fossil fuels has also created higher water temperatures and a warmer atmosphere, which most scientists agree are linked to stronger and more dangerous storm systems like the devastating hurricanes in the Caribbean and Gulf of Mexico this fall. Severe tropical storms and strong hurricanes will be both more common and more intense in the near future.** Warmer air holds more water vapor, which leads to more rain—like the historic rainfall we saw during Hurricane Harvey. This also means more intense storm surges, which will come on top of already rising sea levels. [↑](#endnote-ref-5)
6. Joe Cortright, 5-4-2018, "Housing: A shortage of cities," City Observatory, http://cityobservatory.org/housing\_cortright/

The housing crisis in California, as in many other states, manifests itself as a shortage and high price of housing, but is in fact symptomatic of a deeper and different shortage: a shortage of cities. **The demand for urban living is growing, propelled by the urban-centric nature of knowledge-based industries and a growing consumer demand for dense, diverse, interesting walkable city neighborhoods.** The supply of great urban spaces is constrained by locally controlled land use plans that make it difficult to build housing in the places where it is most highly valued—in dense urban settings. The growing demand for cities Cities make us more productive and innovative. They help workers get matched to job opportunities that best suit their interests and aptitudes. They help workers quickly acquire new skills and move to jobs or firms that can make best use of them (Hsieh & Moretti, 2015). Cities offer huge advantages in consumption as well (Glaeser, Kolko, & Saiz, 2000). Consumers are spending a larger and larger fraction of their income on services. Higher income consumers, faced with a twenty-four hour day, place great store on close proximity to work and to a wide range of consumption amenities (and opportunities for social interaction). Cities are, in effect, an enormous labor-saving technology, reducing the amount of time consumers need to spend learning about, searching for, and traveling to places where they might consume services. In addition, by virtue of their size and diversity, cities offer a wider array of highly differentiated services enabling consumers to get just what they want. The same applies for social interactions, from everything from dating to “club goods” (Mills, 1972) group activities that require a minimum number of participants, whether its mah jong, ultimate Frisbee, square dancing, or dungeons and dragons. **There’s a growing demand for urban living. It’s driven by the preference of young workers for dense, diverse interesting cities.** Census data show that well-educated young adults are increasingly likely to live in close-in urban neighborhoods. In 1980, 25 to 34 year olds were about 10 percent more likely than other residents of large metropolitan areas to choose to live with 3 miles of the center of the central business district. By 2000 they were 32 percent more likely than other residents, and by 2010 51 percent more likely (Cortright, 2014). Data show that the share of well-educated young adults living in the nation’s 50 largest cities increased 19 percent, nearly 5 times faster than the overall increase in city population between 2010 and 2016. [↑](#endnote-ref-6)
7. Alan Boles, 10-3-2016, The Blue Line, "More Market-Rate Housing Means More Market-Rate Housing, Not Cheaper Housing", accessed February 11, 2019, http://www.boulderblueline.org/2016/10/03/more-market-ratehousing-means-more-market-rate-housing-not-cheaper-housing/

At PLAN-Boulder County's annual dinner on September, 23, 2016, San Francisco community organizer Calvin Welch presented a persuasive case that **creating more housing units in booming housing markets, such as San Francisco or Boulder, does not lead to lower housing prices. It just leads to more, high-priced housing.** Welch was a founder of the Coalition for San Francisco Neighborhoods and the Council of Community Housing Organizations. He teaches classes at the University of San Francisco and San Francisco State University. He has served on various San Francisco task forces and advisory committees on issues ranging from affordable housing to financing to living wages. **Welch noted that "unaffordable housing" is a phenomenon that has spread across the United States in the last few years and affects almost every city with a thriving economy**. He claimed that the free market functions effectively to control prices over the long run for most goods and services, but that it is not able to do so for health care services and housing in highly prosperous urban areas. Welch marshaled an array of facts and figures to support his position. He asserted that from 1960 to 2000, San Francisco's population increased by 64,561 people, and it also added a robust 91,933 housing units - or one such unit for every 1.4 new residents. **From 2000 to 2009, substantially more market rate dwelling units had been built in San Francisco than the city had set as its goal, while, conversely, "affordable" housing production drastically fell behind the goal.** From 2007 to 2016, 77% of the new units produced were "market rate" (that is, affordable by people with incomes above 120% of Area Median Income, or "AMI"), 4% were for "moderate income" residents (120% to 80% of AMI), and 19% were for "lower income" people (less than 80% of AMI). **Yet from 1996 to 2015, while the median family income of San Francisco residents increased by 60%, the median price of a single family residence increased by a whopping 398%.** [↑](#endnote-ref-7)
8. **Glaser 2005 NBER**

https://www.nber.org/papers/w11097.pdf

population and income growth (significant at the 5% and 10% levels, respectively), but not higher house price appreciation. The coefficient of 1.28 indicates that this labor demand proxy strongly predicts population growth in low-regulation metropolitan areas. We cannot reject the null that population rises proportionately with predicted labor demand. A 1% increase in labor demand is also associated with $92 higher real wage growth. This effect is equivalent to about 1/3 of a standard deviation of changes in income, so the size of this effect is not large economically. Finally, stronger labor demand is not associated with higher house price appreciation in the typical market. The point estimate is negative, but it is both small in economic magnitude and not close to being statistically significant. The impacts of the coefficients on the interaction between this labor demand variable and the degree of housing supply regulation are reported in the second row. These results indicate that more inelastically supplied markets have weaker population growth (column 1) and stronger house price appreciation (column 3) in response to an increase in labor demand (with both coefficients being significant at the 10% level), but there is no differential impact found for income. The magnitudes of the population growth and house price appreciation effects are economically important. **The effect of labor demand on population growth is 50% lower in areas with highly regulated housing markets. An increase in labor demand had no substantial effect on housing prices in less regulated areas, but a 1% increase in labor demand in areas with strongly regulated housing supplies is associated with an increase in housing prices of $19,000 per year**. Compared with the standard deviation of changes in housing prices of $3,467 in this sample, **the magnitude of this effect is quite large**. The second panel of Table 4 reports results using the initial share of the adult population with a college degree to reflect productivity differences. The findings in the first row are qualitatively similar to those in the top panel, and show that stronger labor demand is associated with significantly higher population growth and real income growth, but not higher real house price appreciation. These estimates imply that metropolitan areas with 1% more college-educated workers experienced .09% greater population growth in less 19 regulated areas, an effect that is one tenth the size of the effect of predicted labor demand. The effect of education on wages is also somewhat smaller [↑](#endnote-ref-8)
9. <https://www.huduser.gov/portal/pdredge/pdr_edge_research_081712.html>

Of the 11,290 properties in the study, researchers found that, by 2009, 3,699 (about 32%) were no longer monitored by state HFAs, which means that they could be charging higher rents. **However, despite the lack of affordability restrictions, the researchers found that “the vast majority” of these properties are still affordable**. Some are owned by mission-driven entities (nonprofit or even for-profit owners committed to long-term affordable housing) and some are subject to other affordability mandates. Other properties remain affordable simply by default; by Year 15, the restricted rents for LIHTC units are the same as market rents for similar units in similar locations. To further explore the properties no longer monitored by HFAs, researchers surveyed rents on 100 properties of 20 or more units in low-poverty areas. **They found that about half (49%) had rents less than the LIHTC restriction, and another 9 percent had rents within 105 percent of the LIHTC rent**. The researchers found that a moderate proportion of properties are recapitalized as affordable housing, made possible by such additional public subsidies as new 4- or 9-percent tax credits allocated to the properties following the first 15 years. These credits may be used for rehabilitation or for buying the property from the original developer. **The least common outcome, according to the study, is transforming LIHTC properties into market-rate housing,** a scenario that is most likely when the property is located in a low-poverty area. [↑](#endnote-ref-9)
10. Erika C. Poethig of the Urban Institute Blog, in “One in four: America’s housing assistance lo ery”, 5-28-14, h ps://www.urban.org/urban-wire/one-four-americas-housingassistance-lo ery, accessed 2-10-19

**With such a large rent burden, these households can’t afford to pay for food, transportation to work or school, prescriptions, education or training, and other needs. Families with affordable housing have greater access to a chain of benefits, from better health to more resources for education**. For example, families with affordable housing spend $151 more on food a month than families with severe housing burdens. **Children who receive inadequate nutrition are sick more often, suffer growth and developmental impairments, and have lower educational achievement. From the very start, these children have more limited opportunities.** [↑](#endnote-ref-10)
11. **Reduce childhood poverty**

Mary Cunningham, Urban Institute, 06/26/16. “Reduce poverty by improving housing stability” <https://www.urban.org/urban-wire/reduce-poverty-improving-housing-stability>

**The importance of housing stability is often overlooked in the poverty debate** Considering these outcomes, policymakers should be buzzing about the potential impacts of increasing housing stability. But there doesn’t seem to be a lot of political will for increasing housing. Although House Speaker Paul Ryan’s recently released anti poverty plan addresses increasing housing choice and work requirements among those with housing vouchers, the plan doesn’t propose increasing access to vouchers. If we care about ending poverty, especially among children, we should start with housing as a way to support parents early, as Sabrina suggests, before they experience the toxic stress that comes from extreme poverty, moving around, and neglect. Increasing housing benefits could reduce child poverty by 21 percent How much could increasing housing benefits reduce poverty among children? **Urban Institute research shows that increasing access to housing vouchers to a targeted group of about 2.6 million poor, rent-burdened households with children could reduce child poverty by as much as 21 percent** (a bigger impact than we see by expanding transitional jobs, child support, the earned income tax credit, Supplemental Nutrition Assistance Program benefits, or increasing the minimum wage to $10.10). Housing isn’t a panacea—it will take a lot more to end poverty—but it’s a good place to start, and one that is supported by the evidence. After finding a stable place to live, attending parenting classes, and working with her case manager, Sabrina is doing well by most measures: she’s working in a construction job, figuring out how to maintain a routine that provides her young kids stability, and finding enough energy to play with them after a long day at work. Life is still hard, but it isn’t falling apart. She can make ends meet. She is thinking about a career after her kids enter school in a few years. She is saving for a washing machine and dryer for her apartment. The latest pictures of her children hang proudly on the wall over the TV. [↑](#endnote-ref-11)
12. Andrew **Aurand** & Dan **Emmanuel**, 9-12-**2018**, "Hundreds of Thousands of Low-Income Families Threatened by Hurricane Florence," **NLIHC**, <https://hfront.org/2018/09/12/thousands-of-low-income-families-threatened-by-hurricane-florence/>

Thousands of vulnerable families along the East Coast are bracing themselves for Hurricane Florence. **If the history of past storms like Harvey is repeated, low-income families and renters could be disproportionately impacted and will have a more difficult time recovering given their often limited resources**. In fact, **recent research indicates that homeowners, and households who are white, affluent, and with more education, are likely to build wealth after a disaster, while minorities and renters lose it.** Hurricane Florence threatens a significant number of vulnerable households, given the current forecasts by the National Weather Service. **Nearly 280,000 very low-income renter households reside in counties where hurricane, storm surge, or tropical storm alerts have been issued in North Carolina, South Carolina, and Virginia**. In addition, more than 136,000 households in these areas lack a car to evacuate if needed. The stock of affordable rental homes in these counties is already insufficient and will worsen, with damage likely to occur to some of the 240,000 currently affordable rental homes for low-income renters. Among housing that is not damaged, rents will become unaffordable to financially-disadvantaged families. According to data from the National Housing Preservation Database, only 82,000 rentals in these areas are subsidized for low-income renters, which are also, of course, at risk. The area’s housing stock includes 340,000 mobile homes, which are a source of affordable housing for lower-income owners and renters like, but can be more vulnerable to damage. table Source: CHAS 2011-2015; National Housing Preservation Database; National Weather Service; ATSDR Social Vulnerability Data 2016 Flooding is expected to create more risks further inland. When we include areas identified by the National Weather Service that will likely experience river flooding, nearly 455,000 very low-income renter households live in the potentially impacted areas of the hurricane and subsequent flooding. More than 155,000 households (both renters and owners) lack a car should they need to evacuate. The housing stock at risk includes 455,000 affordable rental homes, nearly 87,000 of which are subsidized. Nearly 407,000 mobile homes, occupied by owners and renters, are at risk. [↑](#endnote-ref-12)
13. Ian P. **Davies** , Ryan D. **Haugo**, James C. **Robertson**, Phillip S. **Levin**, 11-2-**2018**, "The unequal vulnerability of communities of color to wildfire," **Public Library of Science**, <https://journals.plos.org/plosone/article?id=10.1371/journal.pone.0205825>

Globally, **environmental disasters impact** billions of people and cost trillions of dollars in damage, and their impacts are often **felt most acutely by** **minority and poor communities**. **Wildfires in the U.S. have similarly outsized impacts on vulnerable communities**, though the ethnic and geographic distribution of those communities may be different than for other hazards. Here, we develop a social-ecological approach for characterizing fire vulnerability and apply it to >70,000 census tracts across the United States. Our approach incorporates both the wildfire potential of a landscape and socioeconomic attributes of overlying communities. We find that over 29 million Americans live with significant potential for extreme wildfires, a majority of whom are white and socioeconomically secure. Within this segment, however, are 12 million socially vulnerable Americans for whom a wildfire event could be devastating. Additionally, wildfire vulnerability is spread unequally across race and ethnicity, with census tracts that were majority Black, Hispanic or Native American experiencing ca. 50% greater vulnerability to wildfire compared to other census tracts. Embracing a social-ecological perspective of fire-prone landscapes allows for the identification of areas that are poorly equipped to respond to wildfires. [↑](#endnote-ref-13)
14. <https://www.huduser.gov/portal/pdredge/pdr_edge_research_081712.html>

Of the 11,290 properties in the study, researchers found that, by 2009, 3,699 (about 32%) were no longer monitored by state HFAs, which means that they could be charging higher rents. **However, despite the lack of affordability restrictions, the researchers found that “the vast majority” of these properties are still affordable**. Some are owned by mission-driven entities (nonprofit or even for-profit owners committed to long-term affordable housing) and some are subject to other affordability mandates. Other properties remain affordable simply by default; by Year 15, the restricted rents for LIHTC units are the same as market rents for similar units in similar locations. To further explore the properties no longer monitored by HFAs, researchers surveyed rents on 100 properties of 20 or more units in low-poverty areas. **They found that about half (49%) had rents less than the LIHTC restriction, and another 9 percent had rents within 105 percent of the LIHTC rent**. The researchers found that a moderate proportion of properties are recapitalized as affordable housing, made possible by such additional public subsidies as new 4- or 9-percent tax credits allocated to the properties following the first 15 years. These credits may be used for rehabilitation or for buying the property from the original developer. **The least common outcome, according to the study, is transforming LIHTC properties into market-rate housing,** a scenario that is most likely when the property is located in a low-poverty area. [↑](#endnote-ref-14)
15. Donna **Kimura**, 9-16-**2014**, "Treasury Sued Over LIHTC Program," **Housing Finance**, <https://www.housingfinance.com/finance/treasury-sued-over-lihtc-program_o>

From 1995 to 2002, 41 percent of LIHTC units in the United States were in tracts with more than 50 percent minority population. Widening that window to 2006, the percentage increased to 44 percent, according to the suit. ICP’s claims are based on the disparate impact theory of liability in which statistics are used to show that racial minorities are harmed by the policies, says Michael W. Skojec, a partner at the Ballard Spahr law firm. No intentional discrimination has to be proven. **The Department of Housing and Urban Development recently issued a new rule that formalized the use of the disparate impact theory under the Fair Housing Act, according to Skojec.** This rule could again be tested if the court hears the ICP case. The LIHTC industry will be watching to see what effects the lawsuit may have on the program. The earlier TDHCA case has had a serious impact on housing development in certain census tracts, says Sharon Wilson Geno, a partner at Ballard Spahr and leader of the firm’s government-assisted housing practice. [↑](#endnote-ref-15)