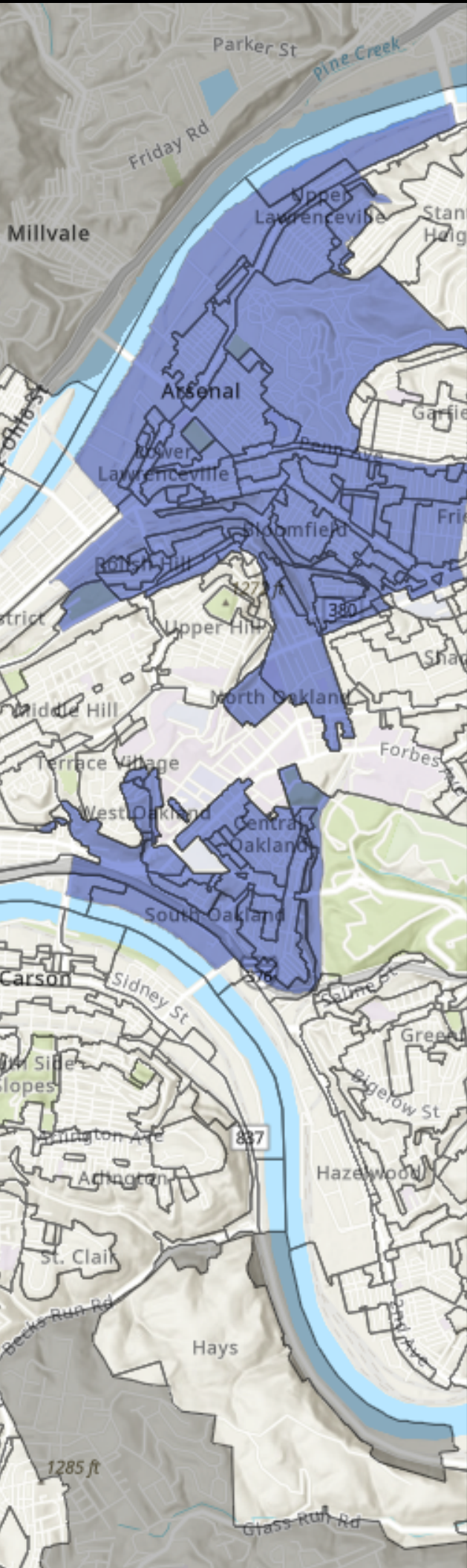




Office of the City
Controller
Rachael Heisler

Special Report:

Inclusionary Zoning and Affordable Housing Financing

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Report Highlights

Executive Summary

In February 2015, City Council passed a resolution establishing an Affordable Housing Task Force “to assess the current and projected future landscape of housing affordability in the City of Pittsburgh... and make recommendations to the Mayor and City Council.” By that point, rising rental costs had become a top concern for local residents, particularly low-income families whose dwindling options were driving them to relocate in lower-cost Pittsburgh suburbs.

One of the Task Force's recommendations was the adoption of **Inclusionary Zoning (“IZ”)**, a policy that had grown increasingly popular with local governments as a means of requiring certain developers to include affordable units in their market-rate projects. Though many variations exist, IZ generally sets a minimum percentage of affordable units that must be included in housing projects over a certain size.

Aside from the primary goal of expanding affordable housing inventories, IZ also aims to promote economic integration. When low-income households move to neighborhoods where more affluent families live and work, adults and children alike generally have better access to economic and academic opportunities, basic amenities, quality housing, and improved health outcomes.

City Council began testing inclusionary zoning in 2019, initially limiting its scope to Lawrenceville where rising costs and low-income displacement have been among the highest in the city. After making the Lawrenceville pilot program permanent, IZ was then expanded to Bloomfield, Polish Hill, and the residential sections of Oakland between 2021 and 2023.

Since the Task Force made its first recommendations nearly a decade ago, the affordable housing crisis has grown worse both locally and nationally, exacerbated by pandemic-era disruptions. In this environment, local debates over the appropriate policy response have become divisive. Some community advocates have advocated expanding IZ citywide, arguing large developer profits and existing financing sources are sufficient to subsidize affordable units, while others place blame for the housing shortage on onerous zoning rules that restrict the financial viability of proposed projects. Financing is a central topic of these debates since advocates and opponents disagree on whether existing IZ policies are “funded” or “unfunded.”

This report has two aims: using data directly from the Department of City Planning (DCP), provide unit construction data in Lawrenceville and comparable neighborhoods, which has been the subject of recent debate between local community groups; and provide information on available housing financing sources. **We conclude with a recommendation for the Department of City Planning to make real-time housing construction data available online, allowing local stakeholders to monitor and analyze ongoing trends at the neighborhood level.** We hope this report will serve as a constructive resource for local stakeholders and supplement ongoing conversations regarding the future of housing policy in Pittsburgh.

Inclusionary Zoning Requirements in Pittsburgh

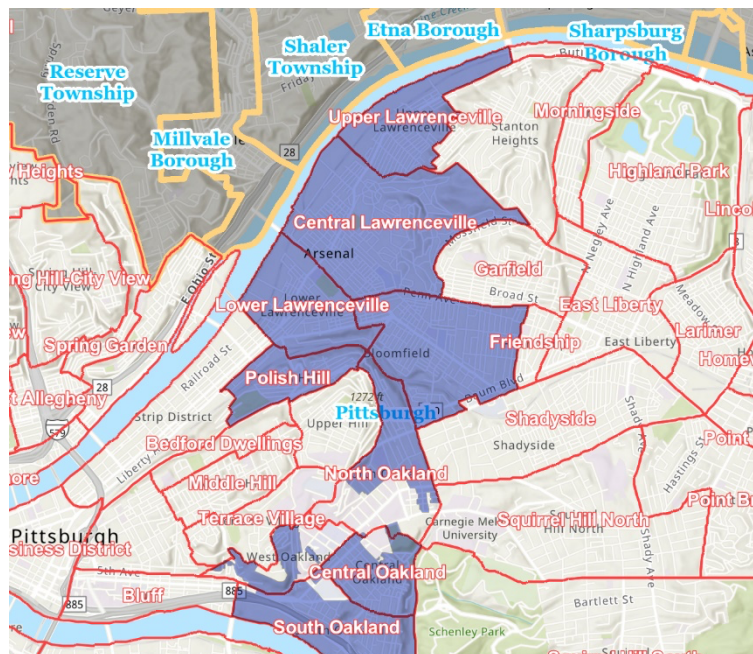
The following apply to Inclusionary Zoning Ordinances currently in effect for Lawrenceville, Bloomfield, Polish Hill, and applicable parts of Oakland:

- **Inclusionary Housing Overlay District ("IZ-O"):** Inclusionary Zoning was first established in Pittsburgh by Ordinance 28 of 2019, initially limited exclusively to Central, Lower, and Upper Lawrenceville. IZ requirements are enforced through the Zoning Code by creating a new "overlay district", a geographical boundary placed over existing zoning districts.
- **Inclusionary Rental Unit Requirements:** Under Lawrenceville's IZ requirements for *rental units*, any construction or substantial improvement of housing projects with 20 or more dwelling units must include at least 10% of its total units as "Inclusionary Rental Units". Eligible households cannot earn more than 50% of area median income (AMI) and must recertify eligibility annually. After moving into an IZ unit, household earnings may grow without affecting eligibility until income reaches 80% of AMI, at which they will no longer be permitted to renew the lease for that unit.
- **Allowable Pricing:** "Allowable pricing", which caps the total amount a tenant of an IZ rental unit may pay on rent and utilities, is set at 30% of monthly income for a household earning 50% of AMI. Eligible household size is determined by multiplying the bedroom count by a multiplier of 1.5. For example, an IZ rental unit with two bedrooms would be eligible for households of three people ($2 \times 1.5 = 3$). If a *rental subsidy* (such as a Section 8 voucher) is provided, these totals may exceed the Allowable Pricing cap as long as the share paid by the tenant does not.
- **Enforcement Mechanism:** These on-site standards are legally enforced by requiring either a deed restriction on the property or by entering into a master lease with an Affordable Housing Provider (e.g., the Housing Authority of the City of Pittsburgh), both of which require a minimum affordability period of 35 years. If the building is sold during this time, the 35-year affordability period automatically renews with the new owner.
- **Equity Between Affordable and Market-Rate Units:** The ordinance preempts developers who might seek to minimize the cost of mandated inclusionary units by requiring equity with market-rate units in most cases. On-site inclusionary units must be fully integrated throughout each building and "equivalent to market-rate units within the building in all ways, including appliances, finishes, and square footage." Core amenities like gym and pool access or a parking space must be shared with residents in inclusionary units at no additional cost. To preserve the financial viability of penthouse units, developers are not required to include inclusionary units in the top floor of a building if it's less than six stories or the top three floors if it's six stories or more. Finally, in attempt to preserve and expand the city's shrinking inventory of affordable family-sized units, classified as having two or more bedrooms, the ordinance requires an equal share of family-sized inclusionary units as family-sized market-rate units.
- **Affordable Homeownership:** To ensure IZ is also promoting the goal of permanent affordable homeownership, owner-occupied housing developments (e.g., single-family homes, condos, townhomes) that include at least 20 units are covered as well, albeit with slightly different requirements. Unlike for Inclusionary Rental Units, "Inclusionary Owner-Occupied Units" enforce affordability through either a deed restriction or by selling affordable units to a Community Land Trust. This category's allowable pricing requires an initial sale price of no more than 28% of monthly income on the mortgage payment and any other fees for a household making 70% of AMI (with the same

bedroom multiplier of 1.5). This assumes a 5% down payment and 30-year fixed mortgage rate. Eligible households cannot make more than 80% AMI upon applying, but unlike for inclusionary rental units, there is no requirement that they vacate the unit if their income rises over time.

- **Option for Off-Site Affordability:** While inclusionary units are typically included “on-site,” meaning they are fully integrated with market-rate units in a single building or complex of buildings, the ordinance grants developers an option to construct off-site units instead. A developer who chooses this option will have a slightly higher requirement for total inclusionary units (12% compared to 10% for on-site projects), must own a suitable site to build those units no more than 0.25 miles from the primary project site, and “provide evidence of an enforceable commitment” to invest at least \$200,000 per off-site inclusionary unit. Finally, they must submit an analysis showing the off-site project has comparable transit service as the primary site.

Figure 1



Pittsburgh's Inclusionary Zoning Overlay Districts (shaded in blue)

Housing Construction Data

Analyses from Community Advocacy Groups

Pro-Housing Pittsburgh: January 2025 Report

In January of 2025, local advocacy group Pro-Housing Pittsburgh (PHP) released a report authored by Jack Billings and David Vatz titled, "The Effects of Inclusionary Zoning on New Construction in Pittsburgh."¹ Their goal was to determine, using the difference-in-differences method, whether the implementation of inclusionary zoning in Lawrenceville has resulted in less construction of housing with 20 or more units. The Strip District and South Side Flats neighborhoods are used as control groups since they have similar attributes as Lawrenceville but lack inclusionary zoning requirements. Similarities include high rates of housing development in the 2010s; a mixture of residential, commercial, and industrial uses; topography; and prominent riverfronts lined by a commercial main street. The scope of their dataset ranged from 2012 through late 2024.

Importantly, Billings and Vatz' methodology is based on housing units *actually completed*, an approach that differs from the subsequent report. This means that projects still in various stages of development are not included in **post-intervention** totals, **with "intervention" referring to the day that IZ became effective in a given neighborhood**. The authors state that they decided on this approach since people cannot live in projects in development – only those completed and ready for occupancy. Further, they argue, even if a project is fully entitled and financed, there will always be some degree of uncertainty regarding its completion.

However, PHP conducts a second analysis in the appendix of their report, the results of which are described further below. This analysis included both completed and in-development projects, noting that including the latter category increased the size of the effect they found.

¹ Jack Billings and David Vatz, "The Effects of Inclusionary Zoning on New Housing Construction in Pittsburgh." Pro-Housing Pittsburgh. January 27, 2025. <https://www.prohousingpgh.org/blog/inclusionary-zoning-study-release>

Table 1

Pro-Housing Pittsburgh: Inventory of Applicable Multifamily Projects in Lawrenceville				
Project	Address	Total Units	Issued Year	Period Assignment
Locomotive Lofts	4840 Harrison St	34	2012	Pre-Intervention
Doughboy Square/Square on Butler	3459 Butler St	45	2012	Pre-Intervention
Catalyst Lofts	141 41st St	20	2013	Pre-Intervention
Lawrenceville Place	301-375 Winesap Dr	36	2014	Pre-Intervention
McCleary School Condos	5267 Holmes St	25	2015	Pre-Intervention
The Foundry at 41st	4107 Willow St	182	2016	Pre-Intervention
Arsenal 201 Phase 1	3927 Butler St	243	2016	Pre-Intervention
Mews on Butler	5515 Butler St	68	2017	Pre-Intervention
Lawrenceville Lofts	3725 Butler St	24	2018	Pre-Intervention
Arsenal 201 Phase 2	3931 Foster St	343	2019	Post-Intervention
Sixth Ward Flats	3350 Penn Ave	35	2020	Post-Intervention
Holy Family Church Redevelopment (Aura District and Lofts)	256 44th St	46	2021	In Development
Camp Eight Capital Project (The Foundry Phase II)	108 43rd St	97	2023	In Development
Albion Lawrenceville	5303 Butler St	267	2023	In Development
New Burgh Real Estate Project (37th St. Apartments)	3634 Penn Ave	50	2023	In Development
32 39th Street Redevelopment (The Dalian)	3812 Foster St	334	2024	In Development

Table 2

Pro-Housing Pittsburgh: Inventory of Applicable Multifamily Projects in South Side Flats				
Project	Address	Total Units	Issued Year	Period Assignment
Residences at South High	930 E Carson St	76	2012	Pre-Intervention
Hot Metal Flats	2915 Sidney St	117	2014	Pre-Intervention
3030 South Water Street	3030 S South Water St	56	2014	Pre-Intervention
Brew House Artist Lofts	711 S 21 st St	76	2015	Pre-Intervention
2626 South Side Flats	2626 Tunnel Blvd	264	2015	Pre-Intervention
(Unnamed – Revival on Carson Phase II)	1611 E Carson St	23	2018	Pre-Intervention
Connection at South Side	2984 Sidney St	280	2019	Post-Intervention
The Revival On Carson	1700 E Carson St	47	2019	Post-Intervention
The Park	2695 South Water St	247	2022	Post-Intervention
Greystar Wharton Street	2329 Wharton St	378	2023	In Development
Walnut Capital Jane Street (The Tower)	2100 Jane St	60	2024	In Development
Walnut Capital Mary Street	1900-2000 Mary St	200	2024	In Development

Table 3

Pro-Housing Pittsburgh: Inventory of Applicable Multifamily Projects in the Strip District				
Project	Address	Total Units	Issued Year	Period Assignment
The Yard at 3 Crossings	2645 Railroad St	299	2015	Pre-Intervention
(Unnamed, Condos)	2419 Smallman St	38	2015	Pre-Intervention
Edge 1909	1909 Waterfront Dr	364	2016	Pre-Intervention
The Refinery	2545 Penn Ave	32	2018	Pre-Intervention
1627 on the Strip	1627 Penn Ave	72	2018	Pre-Intervention
Smallman Flats	2908 Smallman St	30	2019	Post-Intervention
The District (1)	1759 Waterfront Pl	264	2019	Post-Intervention
The District (2)	1759 Waterfront Pl	178	2019	Post-Intervention
Helm on the Allegheny	2239 Railroad St	220	2020	Post-Intervention
2554 Smallman	2554 Smallman St	27	2020	Post-Intervention
Forte Pittsburgh	2635 Penn Ave	49	2021	Post-Intervention
Mulberry Lofts	3205 Penn Ave	112	2021	Post-Intervention
Crucible Lofts	3151 Smallman St	255	2021	In Development
31 st Street Studios	77 31 st St	625	2021	In Development
Penn 23	2300 Penn Ave	21	2022	In Development
50 – 26 th Street	50 26 th St	179	2023	In Development
Waterman	(Not Listed)	120	2023	In Development
3129 Liberty	3129 Liberty Ave	21	2023	In Development
2926 Smallman St	2930 Smallman St	89	2023	In Development
Brickworks	2121 Smallman St	288	2023	In Development
The Maxx	2929 Smallman St	234	2023	In Development
3 Crossings Phase II	2855 Railroad St	300	2024	In Development

Table 4

Pro-Housing Pittsburgh: Total Units Produced Before and After IZ		
Neighborhood	Pre-IZ Units	Post-IZ Units
Lawrenceville	677	378
Strip District	805	880
South Side Flats	612	574

Table 5

Pro-Housing Pittsburgh: Rate of Unit Production Before and After IZ			
Neighborhood	Pre-IZ Units/Year	Post Units/Year	% Change
Lawrenceville	94	66	-30%
Strip District	112	152	+36%
South Side Flats	85	100	+18%

Pro-Housing Pittsburgh: Findings

Based on these results and their accompanying regression (see **Figure 2** below), Billings and Vatz conclude that the rate of new construction of large multifamily developments (20 or more units) has **decreased by 30% in Lawrenceville** since the introduction of IZ. During the same period, the **Strip District** and **South Side Flats** did not follow the same trajectory and actually increased production for this housing type (by **36%** and **18%** respectively). Quantified into total housing units, they note this would represent an estimated 317.5 fewer units constructed in Lawrenceville.

Figure 2

	Units	Projects
Intercept	708.50** (127.91)	5.50 (1.46)
Treatment	-31.50 (221.54)	3.50 (2.53)
Post	18.50 (180.89)	-0.50 (2.06)
Treatment × Post	-317.50 (313.31)	-6.50 (3.57)
Observations	6	6
R-squared	0.588	0.745

Notes: Standard errors in parentheses. ** $p < 0.05$.

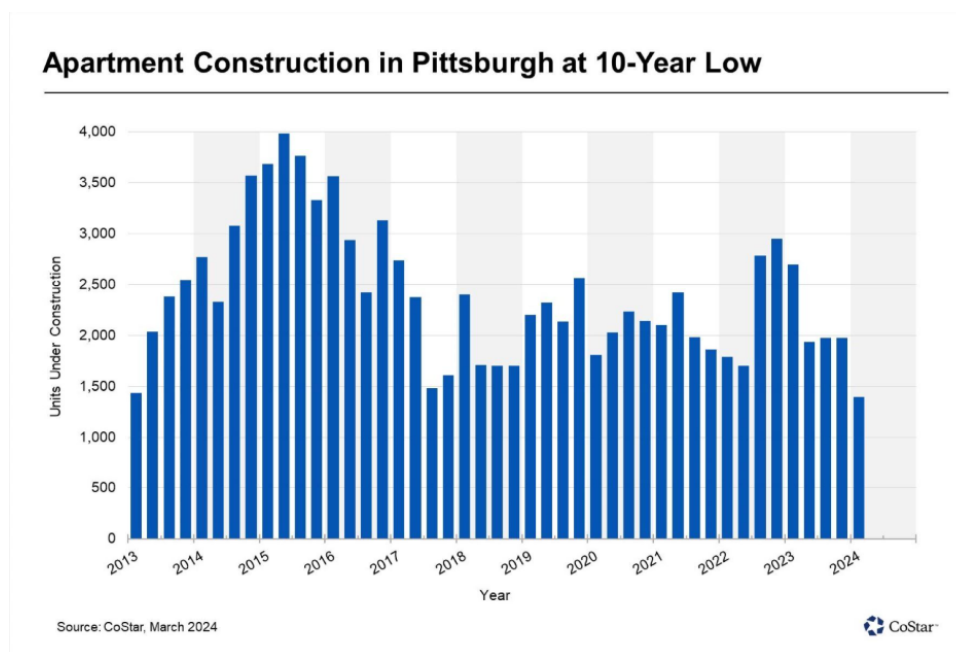
Our DiD suggests IZ has caused 317.5 fewer units to have been completed in Lawrenceville.

*Source: The Effects of Inclusionary Zoning on
New Housing Construction in Pittsburgh (Billings and Vatz, Jan. 2025)*

Billings and Vatz argue that “if IZ policies lead to housing production shifting out of Pittsburgh and into other metropolitan areas, the accompanying reduction in housing supply has the potential to drive rent and home price increases, ultimately creating the most harm for the lowest-income renters and buyers.”

Still, there are limitations to their work that should be acknowledged. First, as the report notes, is that their results do not reach a level of statistical significance due to the limited sample size and noisy data. Pittsburgh's rate of construction has historically been low since the collapse of the steel industry and stark population declines in the decades that followed. Only in the 2010s did more robust development emerge in formerly distressed neighborhoods like Lawrenceville and East Liberty. Projects with 20 or more housing units – the subject of these analyses – were rare until relatively recently and Pittsburgh still produces them at modest levels compared to peer cities.² Still, Billings and Vatz argue that given the magnitude and direction of their results and our own, the results remain economically significant.

Figure 3



Source: “Pittsburgh Ranks Last Among Major Midwest Markets for Apartment Construction” (CoStar Analytics)

In addition, others have noted that this method of measuring completed units is imperfect due to the gap in time between a project receiving approval to begin construction (“entitlements”) and the issuance of a certificate of occupancy. As a result, some projects will be categorized in the post-intervention group despite having been approved to begin construction in the pre-

² Veronica Miniello, “Pittsburgh Ranks Last Among Major Midwest Markets for Apartment Construction.” CoStar. March 11, 2024. <https://www.costar.com/article/264830294/pittsburgh-ranks-last-among-major-midwest-markets-for-apartment-construction>

intervention period. The Western Pennsylvania Regional Data Center has noted that a more optimal approach would combine multiple datasets, noting that currently “there is no dataset of new housing in Pittsburgh” and that “permit data alone isn’t going to provide a complete picture of development activity.”³

Pro-Housing Pittsburgh: Second Analysis Including Projects in Development

In the appendix of their report, Billings and Vatz repeated their analysis, this time including projects and units still under development in the post-intervention period. This analysis addresses critiques that by not including projects currently in development or under construction, it overlooks future output.

Table 6

Pro-Housing Pittsburgh: Total Units Produced Before and After IZ (Projects In-Development Included)				
Neighborhood	Pre-IZ Units	Post-IZ Units (Completed Only)	In- Development Units	Post-IZ Units (Completed + In- Development)
Lawrenceville	677	378	794	1,172
Strip District	805	880	2,132	3,012
South Side Flats	612	574	638	1,212

Table 7 shows resulting calculations from this analysis. The authors state that even after running these totals through another regression, “including proposed units does not change the conclusion that IZ policy is likely harming housing production in Lawrenceville,” causing “908.5 less market rate units than it otherwise would have.”

Table 7

Pro-Housing Pittsburgh: Rate of Unit Production Before and After IZ (Projects In-Development Included)			
Neighborhood	Pre-IZ Units/Year	Post Units/Year	% Change
Lawrenceville	94	204	+117%
Strip District	112	524	+367%
South Side Flats	85	211	+148%

³ Open Letter to the City Paper, WPRDC. January 26, 2025. <https://www.wprdc.org/en/dispatches>

Figure 4

Table 7: Difference-in-Differences (DID) Regression Results

	Units	Projects
Intercept	708.50 (640.04)	5.50 (4.26)
Treatment	-31.50 (1108.59)	3.50 (7.37)
Post	1403.50 (905.16)	6.50 (6.02)
Treatment × Post	-908.50 (1567.78)	-8.50 (10.43)
Observations	6	6
R-squared	0.627	0.383

Notes: Standard errors in parentheses. ** $p < 0.05$.

Source: *The Effects of Inclusionary Zoning on New Housing Construction in Pittsburgh* (Billings and Vatz, Jan. 2025)

Billings and Vatz relied on the Western Pennsylvania Regional Data Center (WPRDC) as their data source while cross-checking unit counts with AgencyCounter, certificates of occupancy, and floorplans when available. Though this data originates from the City of Pittsburgh, our independent work with DCP has shown that there are sometimes discrepancies between information shown on building permits, information found in DCP's data systems, and external reporting such as developers' own materials. For this reason, our analysis further down in this report attempts recreate this work using data provided and verified directly by DCP staff.

Lawrenceville United and PCRG: January 2025 Report

In January 2025, Lawrenceville United's Executive Director Dave Breingan and the Pittsburgh Community Reinvestment Group's (PCRG) Research Analyst Druta Bhatt and released a report titled "The Case for Citywide Mandatory Inclusionary Zoning in Pittsburgh."⁴ The report argues that the program is working as intended and "on track to deliver 116 affordable units" in Lawrenceville, with 35 units built and occupied as of that month.

Breingan and Bhatt levy a number of critiques against the Billings and Vatz report. The first relates to their methodology. PCRG and LU argue that while it's true that people cannot yet live in proposed units, IZ is still applied at the "entitlement phase,"⁵ so a developer that proceeds with a project is already factoring in any added costs. They note that, "so far, there have not been any examples of entitled development projects failing to move forward, even under the most unusual circumstances." For that reason, their analysis includes both completed and proposed projects in their post-intervention universe.

⁴ Dave Breingan and Druta Bhatt, "The Case for Citywide Mandatory Inclusionary Zoning in Pittsburgh." PCRG. Jan. 2025. <https://static1.squarespace.com/static/5cbf18e30490790d47a089a2/t/6798e41b1f96da4fc56a9389/1738073122332/IZ+Report.pdf>

⁵ The "entitlement phase" refers to the process of compiling land use and regulatory approvals needed to acquire a property and begin construction. DCP noted to the researchers that this is not a term used formally within the Department and is more often used by developers.

They also draw attention to the use of WPRDC data, citing University of Pittsburgh regional economist Chris Briem as warning that “the permitting data from the City of Pittsburgh is notoriously faulty.” On January 26, 2025, the WPRDC published a blog post titled “Open Letter to the City Paper,” in reference to an article that discussed disagreements about permitting data between local advocacy groups.⁶ In the post, WPRDC representatives note their disagreement with the way its datasets – which primarily serve *administrative* uses -- were characterized and that administrative data is not always directly transferable for any use (in this case, analyzing housing construction).

The dataset used, “PLI Permits,” originates from the permitting software used by the Department of Permits, Licenses, and Inspections.⁷ We did not analyze the extent to which data derived from WPRDC differs from DCP’s internal datasets, but we did compare final project inventories and unit counts to our own.

Breingan and Bhatt’s own analysis of housing construction focuses only on Lawrenceville. **Table 8** below shows their own inventory of applicable projects. They also note that two listed projects (Doughboy Square/The Square on Butler and Sixth Ward Flats) were Low-Income Housing Tax Credit (LIHTC) projects, which allowed them to finance more deeply affordable units.

⁶ “Open Letter to the City Paper”

⁷ “PLI Permits,” Western Pennsylvania Regional Data Center. <https://data.wprdc.org/dataset/pli-permits/resource/f4d1177a-f597-4c32-8cbf-7885f56253f6>

Table 8

Lawrenceville United and PCRG: Inventory of Applicable Multifamily Projects in Lawrenceville				
Project	Address	Total Units	Total IZ Units	Period Assignment
Locomotive Lofts	4840 Harrison St	34	-	Pre-Intervention
Doughboy Square /The Square on Butler	3459 Butler St	45	-	Pre-Intervention
Catalyst Lofts	141 41st St	20	-	Pre-Intervention
Lawrenceville Place	301-375 Winesap Dr	36	-	Pre-Intervention
McCleary School Condos	5251 Holmes St *	25	-	Pre-Intervention
The Foundry at 41st	4001 Willow St *	191*	-	Pre-Intervention
Arsenal 201 Phase 1	3927 Butler St	243	-	Pre-Intervention
Mews on Butler	5515 Butler St	68	-	Pre-Intervention
Lawrenceville Lofts	3719 Butler St *	25*	-	Pre-Intervention
Sixth Ward Flats	3350 Penn Ave	35	-	Pre-Intervention
Arsenal 201 Phase 2	3931 Foster St	343	35	Post-Intervention
Aura District and Lofts (aka Holy Family)	250 44th St *	45*	5	Post-Intervention (In Development)
4107 Willow St Development (The Foundry Phase II)	4107 Willow St *	97	10 **	Post-Intervention (In Development)
Albion Lawrenceville	5303 Butler St	267	27 **	Post-Intervention (In Development)
37 th St. Apartments (Unnamed New Burgh Real Estate Project in PHP report)	3634 Penn Ave	50	5 **	Post-Intervention (In Development)
The Dalian (32 39th Street Redevelopment)	32 39 th St *	334	34 **	Post-Intervention (In Development)

* Indicates slightly different address or unit count from DCP-provided data

** Indicates developer has agreed to accept Housing Choice Vouchers to deepen affordability

Table 9 shows the resulting unit construction rates in Lawrenceville before and after implementation of IZ. By including projects still under development, they conclude that applicable multifamily projects **increased in Lawrenceville by 96%**.

Table 9

PCRG and Lawrenceville United: Rate of Unit Production Before and After IZ (Projects In-Development Included)				
Neighborhood	Pre-IZ Units	Pre-IZ Units/Year	Post-IZ Units	Post-IZ Units/Year
Lawrenceville	722	101	1,136 (343 Complete, 793 In-Development)	198 (+96%)

Breingan and Bhatt highlight the growing acceptance of Housing Choice Vouchers (HCV) in new projects as an indicator that developers are not only securing the financing they need for affordable units but also reaching a deeper level of affordability due to the way the HCV program prioritizes those classified by HUD as “extremely low-income” (at or below 30% of area median income).

To strengthen the program further, the Housing Authority of the City of Pittsburgh (HACP) last modified their **voucher payment standards** in 2022, which refers to the maximum rent the HACP is willing to accept and subsidize on behalf of a tenant. These changes created a tiered system that utilizes census tract-level rental data to set payment standards. At the tract-level, differences in housing markets between neighborhoods are captured more acutely than with other available measurements like the Small Area Market Fair Rent (SAMFR), which captures data at the Zip Code level. The new standards also result in greater payments to landlords, incentivizing participation without sacrificing profitability. And by setting Pittsburgh’s IZ eligibility for affordable units at or below 50% of area median income, all beneficiaries should in theory be eligible for vouchers. Pittsburgh’s IZ ordinances also allow property managers accepting vouchers to exceed its “allowable pricing” requirements, resulting in a lower rent for the tenant and a higher subsidy for the manager.

Table 10 is similar to one shown in the Breingan and Bhatt report, illustrating how allowable pricing for affordable units compares to the HACP’s payment standards at the lowest and highest tiers. In all cases, property managers have greater flexibility to charge higher rents while the amount paid by tenants typically remains capped at 30% of monthly income.

Table 10

PCRG and Lawrenceville United: Allowable Pricing for Affordable Units Compared to HACP's 2025 Voucher Payment Standards				
	Efficiency	1 BR	2 BR	3 BR
Allowable pricing for inclusionary unit	\$886	\$949	\$1,139	\$1,316
HACP voucher payment standard (Tier 6)	\$1,265	\$1,354	\$1,623	\$2,069
HACP voucher payment standard (Tier 1)	\$1,840	\$1,970	\$2,360	\$3,010

One assumption made by Breingan and Bhatt is that Housing Choice Vouchers will remain available and administered efficiently indefinitely. As explored in the Controller's 2025 Special Report on the HACP, the local HCV program been beleaguered with high rates of staff turnover while landlords routinely receive mixed messages from HACP representatives regarding the availability of tenants on the waitlist, both of which have negatively impacted participation.⁸ More concerning, ongoing cuts to federal housing funding means future allocations are likely to remain highly uncertain for the foreseeable future. This environment has already prompted the Allegheny County Housing Authority to issue a freeze on new vouchers, highlighting the need to build resilient local and state financing alternatives.⁹

Accounting for Differences in Data:

Breingan and Bhatt's dataset had 45 more units in their pre-IZ period than Billings and Vatz:

- Period coding difference for Sixth Ward Flats (35 units)
- 9-unit difference for the Foundry Phase I
- 1-unit difference for Lawrenceville Lofts

Breingan and Bhatt's dataset had 36 fewer units in their post-IZ period than Billing and Vatz:

- Period coding difference for Sixth Ward Flats (35 units)
- 1-unit difference for Aura District and Lofts
- Billings and Vatz had a 97-unit project labeled "Camp Eight Capital Project" in their inventory that could not be identified in DCP's datasets. Breingan and Bhatt have a 97-unit Foundry Phase II project in their inventory, which Billings and Vatz did not have.

⁸ Office of the City Controller, "Special Report: Housing Authority of the City of Pittsburgh." May 2025. <https://www.pittsburghpa.gov/files/assets/city/v/1/controller/documents/special-report-hacp-may-2025.pdf>

⁹ Tim Grant, "Allegheny County housing authority tightens spending for Section 8 housing." *Pittsburgh Post-Gazette*. March 17, 2025. <https://www.post-gazette.com/news/social-services/2025/03/17/allegheny-county-housing-authority-section-8/stories/202502200029>

Department of City Planning Data in Lawrenceville and Comparison Neighborhoods

Lawrenceville's inclusionary zoning program initially began as a pilot in 2019 with a six-month extension before being made permanent in 2021. Inclusionary zoning was expanded to Polish Hill and Bloomfield in 2022, then to most of Oakland in 2023. **Given the recency of those expansions, this section will focus solely on housing data in Lawrenceville and its two comparison neighborhoods.**

This section attempts to recreate the type of analysis conducted by both Billings and Vatz and Breingan and Bhatt, this time utilizing data directly from the Department of City Planning.

We selected South Side Flats and the Strip District as control groups for the same reasons cited by Billings and Vatz: similar topography with riverside districts, mix of commercial and residential elements, and notable upticks in building development throughout the 2010s.

Neighborhood housing markets are open systems and many factors can influence construction rates. It's important to note that such comparisons are imperfect and require isolating as many extraneous variables as possible to reach a statistically significant conclusion. Though this was beyond our office's capacity, we encourage further research in this area.

Data Cleaning and Methodology

The data in this section was primarily derived from two separate building permit datasets that DCP provided to our researchers.

The first dataset captured permits from DCP's former software system, Accela, and ranged from 2010 through 2019. The second dataset captured permits from DCP's current software system, POSSE, and ranges from 2019 through the present.

The researchers cross-checked DCP's listed unit counts against the information found in permit work descriptions and Certificates of Occupancy. Since a Certificate of Occupancy issuance is one of the very last steps in City Planning's approval process, this is generally a good estimate of a project's completion date.

There were a number of scenarios that required data cleaning and unit verification. Examples include different permits for the same project (creating duplicate counts), permits for construction work that didn't result in new permits (i.e., additions and alterations), and unit count discrepancies between the occupancy permit, work description field, and/or developers' own materials. Address fields were sometimes missing from projects originally logged in DCP's prior software system, Accela. We relied on direct collaboration with DCP to work through each of these issues.

DCP also provided our researchers with a list of in-development projects for the three requested neighborhoods. Their staff cautioned that they do not currently have a system in place to delete old applications, so an application sent back to the applicant for revisions will remain in that status indefinitely, even if never completed. As a result, some of the listed projects may be abandoned and not representative of future projects. To filter out at least some of these abandoned projects, those lacking a status update in AgencyCounter before January 2024 were excluded from the final inventory.

How Inclusionary Zoning is applied to projects at the time of adoption:

When inclusionary zoning is proposed for a new neighborhood or region, there are typically projects already in the pipeline at varying stages of the process that did not anticipate planning for those requirements. How then does City Planning determine the cutoff that separates projects needing to comply with the new regulations from those that are exempt?

Once IZ is introduced with notice at a Planning Commission meeting, it becomes a Pending Ordinance, a process that was clarified in 2021 by 922.02 of the City Code. Prior to this, the start date of a Pending Ordinance was considered the date of introduction at City Council. Any complete application at this point in time would not be subject to the requirements of a Pending Ordinance, even if the review period extends beyond the point IZ is adopted. New or incomplete applications must either: (1) comply with the terms of the Pending Ordinance or (2) wait until the legislative process concludes, at which point it will either fail or become law.

A project application's "completeness" is determined by a Zoning Administrator's internal review. For our research, those dates would determine whether projects on the cusp of IZ's effective date should be coded in the pre-intervention period or post-intervention period. Unfortunately, those dates are not formally recorded and retrieving them would require DCP staff to search through each project file and infer what that date might have been. Instead, we coded these projects based on the best available information from DCP.

Based on this information, DCP estimates the "true" effective dates for IZ to be the following, though only Lawrenceville's will be relevant to our research:

- **Lawrenceville: February 19, 2019** (date of Council introduction)
- Bloomfield and Polish Hill: July 13, 2021 (date of Council introduction)
- Oakland: April 26, 2022 (date of first Planning Commission notice)

Inventory of Large Multifamily Housing Developments: Lawrenceville, South Side Flats, and Strip District

Table 11

DCP Data: Inventory of Applicable Multifamily Projects in Lawrenceville					
Project	Permit Number	Address	Total Units	Certificate of Occupancy Issued	Period Assignment
Arsenal 201, Phase I	16-B-01993 16-B-01991 16-B-01988	3939 Butler St	243	8/27/18 8/30/18 9/6/18	Pre-Intervention
Catalyst Lofts	12-B-01993	141 41 st St	20	12/11/13	Pre-Intervention
Doughboy Square/The Square on Butler	12-B-01185	3431 Butler St	45	6/30/14	Pre-Intervention
Locomotive Lofts	12-B-00335	4840 Harrison St	34	8/23/13	Pre-Intervention
The Foundry at 41 st	15-B-03935	105 40 th St	182	6/12/17	Pre-Intervention
Lawrenceville Place	Various (all 36 identified by DCP)	Various	36	Nov. 2015 – Mar. 2017	Pre-Intervention
McCleary School Condos	Various; split between townhomes and condos. Original CoO not identified.	Holmes St	25	Dec. 2019	Pre-Intervention
Mews on Butler	Various (all 68 identified by DCP)	Various	68	Jun. 2019 – Sep. 2021	Pre-Intervention
Arsenal 201, Phase II	BP-2019-07202	147 39 th St	343	12/15/22	Post-Intervention
Lawrenceville Lofts	18-B-04877	3725 Butler St	24	2/19/23	Post-Intervention
Sixth Ward Flats	19-B-00887 19-B-00888	3350 Penn Ave	35	11/29/21 11/30/21	Post-Intervention
Aura District Lofts (aka Holy Family Residential)	DCP-ZDR-2021-07477	250 44 th St	55	n/a	In-Development
Albion Lawrenceville	DCP-ZDR-2022-13832	5275 Butler St	267	n/a	In-Development
Dalian	DCP-ZDR-2023-01893	3812 Foster St	334	n/a	In-Development
37 th Street Apartments	DCP-ZDR-2023-09665	3634 Penn Ave	50	n/a	In-Development
The Foundry, Phase II	DCP-ZDR-2023-04749	4107 Willow St	100	n/a	In-Development
Unit Totals (Lawrenceville): Pre-IZ: 653 Post-IZ: 402 In-Development: 806 All Known: 1,861					

Accounting for Differences in Data:

The Controller's DCP dataset had 24 fewer units in the Lawrenceville pre-IZ period than Billings and Vatz:

- Period coding difference for Lawrenceville Lofts (24 units)

The Controller's DCP datasets had 36 fewer units in the Lawrenceville post-IZ and in-development periods than Billings and Vatz:

- Period coding difference for Lawrenceville Lofts (24 units)
- 3-unit difference for The Foundry Phase II
- 9-unit difference for Aura District and Lofts

The Controller's DCP datasets had 69 fewer units in the pre-IZ period than Brenigan and Bhatt:

- Period coding difference for Lawrenceville Lofts (24 units)
- Period coding difference for Sixth Ward Flats (35 units)
- 9-unit difference for The Foundry Phase I

The Controller's DCP datasets had 72 fewer units in the post-IZ and in-development periods than Brenigan and Bhatt:

- Period coding difference for Lawrenceville Lofts (24 units)
- Period coding difference for Sixth Ward Flats (35 units)
- 10-unit difference for Aura District and Lofts
- 3-unit difference for The Foundry Phase II

By cross-checking the Controller's data with Brenigan and Bhatt, we identified one project initially missed (Lawrenceville Place).

Table 12

City Controller Inventory of Applicable Multifamily Projects in South Side Flats (DCP Data)					
Project	Permit Number	Address	Total Units	CoO Issued Year	Period Assignment
3030 South Water Street Apartments	14-B-01874	3030 South Water St	56	8/16/16	Pre-Intervention
Brew House Lofts	16-B-03954	711 S 21 st St	76	1/22/17	Pre-Intervention
Brix at 26	11-B-00992	75 26 th St	87	4/19/13	Pre-Intervention
Brookfield Properties - 2626 South Side Flats	14-B-02881	2626 Tunnel Blvd	264	1/10/17	Pre-Intervention
Hot Metal Flats	14-B-02383	2915 Sidney St	117	12/1/15	Pre-Intervention
Residences at South High	09-06263	930 E Carson St	76	5/31/12	Pre-Intervention
Glasshouse Pittsburgh	n/a	160 East Station Square Dr.	319	2019	Pre-Intervention
Connection at South Side	19-B-00446	2984 Sidney St	280	7/15/22	Post-Intervention
The Revival on Carson Phase I	18-B-02310	1700 E Carson St	24	5/12/22	Post-Intervention
The Revival on Carson Phase II	BP-2019-01940	1611 E Carson St	23	1/5/22	Post-Intervention
The Park	DCP-ZDR-2020-13024	2695 South Water St	247	10/18/24	Post-Intervention
Greystar Wharton Street	DCP-ZDR-2022-11848	2329 Wharton St	371	n/a	In-Development
The Tower (former UPMC Roesch-Taylor site)	DCP-ZDR-2023-11768	2100 Jane St	58	n/a	In-Development
Unnamed Mary St. Project (former UPMC Mercy South Side site)	DCP-ZDR-2024-00061	2000 Mary St	200	n/a	In-Development
Unit Totals (South Side Flats): Pre-IZ: 995 Post-IZ: 574 In-Development: 629 All Known: 2,198					

Accounting for Differences in Data:

The Controller's DCP datasets had 383 more units in the South Side Flats pre-IZ period than Billings and Vatz:

- By cross-checking our data with the South Side Community Council, we identified one project initially missed (Glasshouse Pittsburgh, 319 units). Though we were unable to identify its Certificate of Occupancy from DCP, both the Community Council and external reporting listed 319 units. Glasshouse Pittsburgh as well as Brix at 26 (87 units) were not listed in Billings and Vatz's dataset.
- Billings and Vatz appear to have double-counted the 23 units for the Revival Carson Phase II. The Revival's two phases have a combined 47 units.

The Controller's DCP datasets had 9 fewer units in the South Side Flats post-IZ and in-development periods than Billings and Vatz:

- 7-unit difference for the Greystar Wharton Street project
- 2-unit difference for The Tower

Table 13

City Controller Inventory of Applicable Multifamily Projects in Strip District (DCP Data)					
Project	Permit Number	Address	Total Units	CoO Issued Year	Period Assignment
(Name Unknown, Condos)	15-B-02466	2419 Smallman St	38	12/21/17	Pre-Intervention
1627 on the Strip	18-B-00831	1627 Penn Ave	72	6/14/18	Pre-Intervention
Edge 1909	16-B-00240	1909 Waterfront Pl	364	12/24/18	Pre-Intervention
Lot 24	11-B-02980	2404 Railroad St	96	2/26/13	Pre-Intervention
The Yards at Three Crossings	14-B-03060	2645 Railroad St	300	9/22/16	Pre-Intervention
2554 Smallman	18-B-01944	2554 Smallman St	27	9/29/21	Post-Intervention
Forte Pittsburgh	BP-2021-05282	2635 Penn Ave	48	10/29/23	Post-Intervention
Helm on the Allegheny	BP-2020-02808	2239 Railroad St	220	10/1/21	Post-Intervention
Mulberry Lofts	BP-2021-04796	3205 Penn Ave	112	12/14/22	Post-Intervention
Smallman Flats	19-B-01090	2916 Smallman St	28	2/23/22	Post-Intervention
The District (1 of 2)	18-B-04223	1759 Waterfront Pl	254	6/8/22	Post-Intervention
The District (2 of 2)	18-B-04221	1679 Waterfront Pl	178	1/10/23	Post-Intervention
The Refinery	17-B-05029	2545 Penn Ave	33	3/24/20	Post-Intervention

Penn 23	BP-2021-09836	2330 Penn Ave	19	N/A	In-development
Unnamed Spruce Way project	DCP-ZDR-2022-02834	2917 Spruce Way	60	N/A	In-development
Unnamed Smallman St project	BP-2023-00939	2930 Smallman St	84	N/A	In-development
Unnamed Railroad St. project	BP-2023-01855	2558 Railroad St	135	N/A	In-development
3 Crossings Phase II	DCP-ZDR-2023-07263	55 27th St	242	N/A	In-development
Unnamed Liberty Ave project	DCP-ZDR-2024-05628	3129 Liberty Ave	21	N/A	In-development
Unnamed Penn Ave project	BDA-2024-02306	1700 Penn Ave	43	N/A	In-development
Unnamed 32nd St project	DCP-ZDR-2024-05916	325 32nd St	50	N/A	In-development
Unnamed 3101 Liberty Ave. project	BDA-2024-04594	3101 Liberty Ave	225	N/A	In-development
Unnamed Smallman St. project	BDA-2024-04595	3220 Smallman St	93	N/A	In-development
Unnamed 3223 Liberty Ave. project	BDA-2024-04716	3223 Liberty Ave, Pittsburgh, Pa 15201-	85	N/A	In-development
Unit Totals (Strip District): Pre-IZ: 870 Post-IZ: 900 In-Development: 1,057 All Known: 2,827					

Accounting for Differences in Data:

The Controller's DCP datasets had 65 more units in the Strip District pre-IZ period than Billings and Vatz:

- Lot 24 (96 units) was identified in our dataset but not in theirs.
- Period coding difference for The Refinery (32 units)
- 1-unit difference for The Yards at 3 Crossings

The Controller's DCP datasets diverged most significantly from Billings and Vatz in the Strip District post-IZ and in-development periods. This may be due to recent and rapid redevelopment in this neighborhood. While there have been many proposed projects in this neighborhood, DCP cautioned that the dataset they provided may include cancelled or withdrawn projects. To filter out projects likely withdrawn or cancelled, the researchers eliminated from the inventory any project lacking a status update in AgencyCounter before January 2024. We attempted to cross-check our data with Strip District Neighbors but did not receive a response.

- There were six projects in Billings and Vatz's inventory not identified in our DCP datasets (Crucible Lofts, 31st Street Studios, 50 26th Street, The Waterman, The Brickworks, and The Maxx).
- There were seven projects in our DCP datasets not identified in Billings and Vatz's. Six of these projects did not have accompanying names in DCP's datasets nor could they be

identified externally. There was a 58-unit difference for 3 Crossings Phase II (242 units via DCP).

- Period coding difference for The Refinery, 1-unit difference (33 units via DCP)
- 2-unit difference for Smallman Flats
- 10-unit difference for The District Phase I
- 1-unit difference for Forte Pittsburgh
- 5-unit difference for 2926 Smallman Street
- 2-unit difference for Penn 23

Comparison of Totals (Completed Projects Only)

Table 14 below shows the housing unit totals for each neighborhood, separated into a “pre-IZ” period (projects completed before February 19, 2019) and a “post-IZ” period (projects completed thereafter).

In both periods, the average number of units created annually was calculated by dividing unit totals by the number of months encompassing each period, then multiplying by 12. Our pre-IZ period spanned **110 months** (January 2010 through February 2019) and our post-IZ period spanned **69 months** (March 2019 through November 2024). Our pre-IZ period is somewhat longer than the 86-month period used by both aforementioned reports, which alters resulting production rates.

Table 14

DCP Data: Rate of Unit Production Before and After IZ					
Neighborhood	Pre-IZ: Total Units Created	Post-IZ Total Units Created	Pre-IZ: Avg. Units/Year Created	Post-IZ: Avg. Units/Year Created	Percent Increase/Decrease
Lawrenceville	653	402	71.2	69.9	-1.8%
Billings & Vatz	677	378	94	66	-30%
South Side Flats	995	574	108.5	99.8	-8.0%
Billings & Vatz	612	574	85	100	+18%
Strip District	870	900	94.9	156.5	+64.9%
Billings & Vatz	805	880	112	152	+36%

Based on the data collected from DCP and other sources, Lawrenceville experienced a 1.8% decrease in the average number of units in large multifamily developments completed since the introduction of IZ, compared to the 30% decrease found by Billings and Vatz. Despite relatively similar unit totals, the longer pre-IZ scope used by the Controller's researchers compressed the resulting annual production rate for the pre-IZ period as compared to Billings and Vatz. This illustrates the degree to which large housing projects accelerated in Lawrenceville in the second

half of the 2010s; extending the scope period incorporates slower historical construction rates. The South Side Flats, which does not have IZ requirements, experienced a sharper decline, though the work of Billings and Vatz suggests an increase over the shorter period they examined.

Using these final unit totals in the difference-in-differences method shown below, results would imply that Lawrenceville has produced 55.5 fewer units than would have been expected. However, it's important to stress that we cannot determine any effect due to the limited sample size for these types of buildings (20 units or more). For that reason, we are unable to make a conclusion regarding the impact of IZ on Lawrenceville housing production under this methodology.

Control Pre-Average	$(995 + 870) / 2 = 932.5$
Control Post-Average	$(574 + 900) / 2 = 737$
Change in Treated	$402 - 653 = -251$
Change in Control	$737 - 932.5 = -195.5$
Difference-In-Difference Interaction	$-251 - (-195.5) = -55.5$

Second Calculation Including In-Development Projects

As Breingan and Bhatt note in their report, only including completed projects in an analysis risks overlooking units that developers have already financially committed to – or lingering delays in construction caused by the pandemic. This second calculation adds projects we identified as “in-development” to the post-IZ period.

The number of months in the post-IZ period cannot be adjusted without knowing exactly when all projects will be completed. However, if we accept Breingan and Bhatt's argument that they are already entitled and almost certain to be constructed, these projects can still be added to each neighborhood's post-IZ totals without adjusting the scope period. Results will not be reflective of actual production rates but may still be instructive for showing how methodology or future uncertainties can alter results.

Still, these results should be interpreted with caution. A planned project may not be realized for a variety of factors, including shifting financing sources or failing to receive zoning variances needed for a specific proposal, as Bloomfield experienced in 2024 when a proposal to redevelop the former ShurSave site was withdrawn.¹⁰ In addition, the unit counts listed by DCP in the early stages of a proposed development are often rough approximations and subject to change as details are finalized.

Table 15 below lists all large multifamily projects our researchers identified as “in-development” as of early 2025. The accompanying columns show whether the developer has committed to inclusionary units and/or Housing Choice Vouchers, as well as each project's current status.

As of early 2025, there are 35 inclusionary units completed and occupied by tenants, all at Arsenal 201 Phase II, though this is expected to rise to 67 by the end of the year with the completion of the Albion Lawrenceville and Aura District and Lofts (also known as the Holy

¹⁰ Ethan Woodfill, “Affordable housing plans in Bloomfield scrapped as Giant Eagle takes over site.” NextPittsburgh. July 24, 2024. <https://nextpittsburgh.com/city-design/affordable-housing-plans-in-bloomfield-scrapped>

Family Church redevelopment). In the long-term, and assuming all projects will be completed as planned, total inclusionary units in Lawrenceville will rise to 116 – representing 10% of the 1,149 total units created across six applicable projects.

Table 15

DCP Data: Lawrenceville Projects with Inclusionary Units (Completed and In-Development)						
Development Name	Address	Total Units	IZ Units	Rent or For-Sale	Vouchers Agreement?	Status
Arsenal 201 Phase II	147 39 th St	343	35	Rent	No	Complete and occupied
Albion Lawrenceville	5275 Butler St	267	27	Rent	No	Under construction; first move-ins expected in summer 2025
Aura District and Lofts (“Holy Family”)	250 44 th St	55	5	For-Sale	Yes	Under construction; Phase I units sold, Phase II units still available
Dalian	3812 Foster St	334	34	Rent	Yes	Approved by DCP; completion date estimated in 2027
Foundry Phase II	4107 Willow St	100	10	Rent	Yes	Approved by DCP; estimated completion date unknown
37th Street Apartments	3532 Penn Ave	50	5	Rent	Yes	Application Complete; estimated completion date unknown

Table 16 shows the results of repeating the calculations found in **Table 14**, this time by adding each neighborhood’s units still under development with units already completed in the post-IZ period. The Lawrenceville results of the two aforementioned reports have been added and italicized for comparison.

Table 16

DCP Data: Rate of Unit Production Before and After IZ (Projects In-Development Included)					
Neighborhood	Pre-IZ: Total Units Created	Post-IZ Total Units Created	Pre-IZ: Avg. Units/Year Created	Post-IZ: Avg. Units/Year Created	Percent Increase/Decrease
Lawrenceville	653	1,208	71.2	210.1	+195.1%
Billings & Vatz	677	1,172	94	204	+117%
Breingan & Bhatt	722	1,136	101	198	+96%
South Side Flats	995	1,203	108.5	209.2	+92.8%
Billings & Vatz	805	3,012	112	524	+376%
Strip District	870	1,957	94.9	340.3	+258.6%
Billings & Vatz	612	1,212	85	211	+148%

As in our first calculation, the Strip District remained the leader in unit creation, followed by Lawrenceville and the South Side Flats. Again using these unit totals in a difference-in-differences calculation, as shown below, results would imply that Lawrenceville has produced 92.5 fewer units than would have been expected. Yet again, due to limited sample sizes, we are not able to conclude any effect on housing production.

Control Pre-Average	$(995 + 870) / 2 = 932.5$
Control Post-Average	$(1,203 + 1,957) / 2 = 1,580$
Change in Treated	$1,208 - 653 = 555$
Change in Control	$1,580 - 932.5 = 647.5$
Difference-In-Difference Interaction	$555 - 647.5 = -92.5$

Future Research

There are a number of alternate factors that could explain variations between these three neighborhoods' construction rates not related to the implementation of inclusionary zoning. Though we use South Side Flats and the Strip District as our control groups, they remain imperfect substitutes. Controlling for extraneous variables would better isolate the primary drivers of differences in housing construction rates. Examples include existing zoned capacity, amount of developable land available, topographical differences, and broader economic trends. Future research would be well suited to examine these differences further.

Further research is also needed to examine the demographics of those actually living in inclusionary units and how it compares to the Housing Choice Voucher population, as well as the internal systems used to select applicants.

Centralizing Pittsburgh Housing Development Data

The disagreements between community groups over the impact of Inclusionary Zoning on housing construction is at least partially attributable to the availability of data. Though the City's database of permitting records is extensive, organizing them requires considerable manual work and knowledge of internal processes. Data researchers are more likely to reach different conclusions when required to make assumptions due to limited data.

Given the variance we've noted between internal city permitting records and externally reported sources regarding structure unit counts, DCP should first strengthen existing datasets by confirming key metrics with developers prior to the issuance of an occupancy certificate, especially market-rate and affordable unit counts.

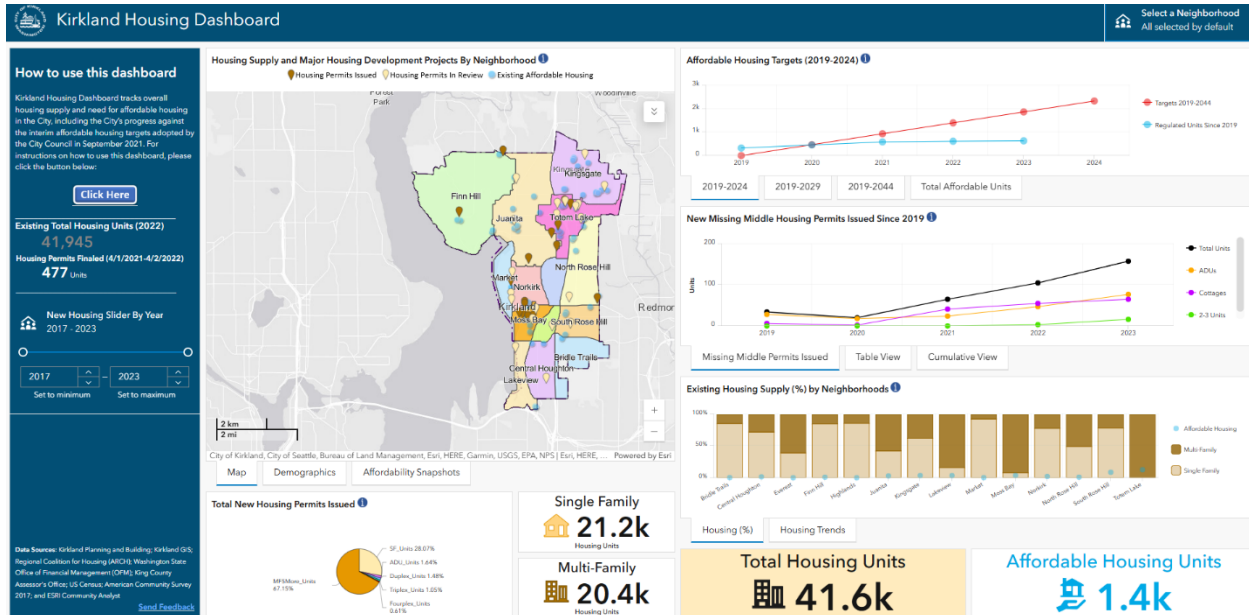
Local stakeholders may disagree on the appropriate policy responses to the ongoing housing crisis, but ensuring that all parties are utilizing the same, accurate data sources should be the first step toward building community consensus. Having real-time data available at the neighborhood level to assess whether housing construction is falling or rising would allow local policymakers to more quickly adjust development strategies.

Kirkland, Washington is a suburb of Seattle with a population of about 91,000. In 2022, city leaders launched the Kirkland Housing Dashboard to track all housing construction and compare market-rate to affordable-rate unit creation, particularly as it relates to housing targets set at the county level.¹¹ Upon its launch, a Kirkland Councilmember said the following:

"Meeting the housing needs of a diverse community continues to be a challenge in our region and a priority of the City Council. This new Housing Dashboard is a transparent and simple way to track current supply and development of housing in Kirkland. Included on the dashboard are key metrics around accessory dwelling units, cottages, and other 'missing middle' housing, which helps us monitor our progress toward the affordable housing targets adopted in September 2021."

¹¹ Cameron Sheppard, "City of Kirkland unveils online housing market data dashboard," Kirkland Reporter. August 17, 2022. <https://www.kirklandreporter.com/news/city-of-kirkland-unveils-online-housing-market-data-dashboard>

Figure 5



Source: Kirkland, WA Housing Dashboard

The interactive dashboard aggregates a variety of housing-related data sources into one centralized location that can be filtered by neighborhood. It includes:

- Current total housing units and total affordable units
- Current total affordable units compared to established targets
- Number of permits approved in the most recent period, broken down by type (single-family, ADU, duplex, triplex, fourplex, and larger multi-family structures)

Kirkland places a particular emphasis on the development and permitting of “missing middle” structures, which it categorizes as accessory dwelling units (ADUs), cottage-style homes, and those with two or three units. All metrics are updated quarterly or annually depending on the data source.

The dashboard's source data is mostly derived from either the Census Bureau's American Community Survey or internal permitting records, both of which would be readily available if a similar effort were pursued by the City of Pittsburgh. The dashboard was built on ArcGIS, the same platform currently used for the City's GIS Data Hub.

In April 2025, the City of Pittsburgh launched an Affordable Housing Project Development Explorer. While we commend this as a positive first step, the scope of its data is currently limited. This dashboard could be strengthened by incorporating a wider variety of housing types, historical trends, and resident demographics at the neighborhood level.

Option 1: Build a City of Pittsburgh Housing Development Dashboard

The Department of Innovation and Performance (I&P) and the Department of Permits, Licenses, and Inspections (PLI) could collaborate to build a Pittsburgh-centric housing development dashboard using continuous real-time data. This would empower residents, community organizations, and local policymakers to better understand how housing trends are evolving on a year-to-year basis.

A City of Pittsburgh Housing Development Dashboard would ideally aggregate the following data at both the citywide and neighborhood levels:

1. Completed Units by Size: single-family, "missing middle" (ADU and 2-4 unit structures), small multifamily (5-19 units), medium multifamily (20-49 units), and large multifamily (50 units or more)
2. Current Affordable Unit Inventory: units held or subsidized by local or state authorities (Public Housing, Housing Choice Voucher, Project-Based Voucher, and Project-Based Rental Assistance), Low-Income Housing Tax Credit, applicable URA programs
3. Median Gross Rent
4. Median Renter/Owner Income
5. Average Structure Age
6. Occupancy/Vacancy Rate

Other metrics that could be included, depending on data availability, include total number of investor-owned homes or total "flipped" homes, both of which have been topics of recent local interest.

For each housing project constructed, PLI should verify, record, and make publicly available the following metrics:

1. Project Address
2. Parcel ID
3. GeoID
4. Number of Units
5. Zoning and Permitting Dates and Records
6. Certificate of Occupancy
7. Demolition Information (when applicable)

Affordable Housing Financing Sources

The Role of Financing in Inclusionary Zoning

While community advocates disagree on inclusionary zoning's overall impact on housing construction rates, there is general agreement that offsetting developers' lost revenue with public subsidies or tax credits can at least partially negate any negative effects on project feasibility. Advocates refer to this approach as "funded" inclusionary zoning, as opposed to "unfunded" programs that require developers to fully absorb any lost revenue. Yet between these two ends of the spectrum are jurisdictions that might be identified as having "partially funded" IZ programs due to incentives that cover some but not all of developers' lost revenues.

This section will outline the most prominent financing sources available to local IZ developers. When applicable, we continue to use Lawrenceville as an example to show how these programs' maximum potential benefits manifest.

The number of localities that have *explicitly* pursued a "funded IZ" strategy remains isolated to a few cities, most notably Portland, Oregon and Baltimore, Maryland. As both of these cities have only implemented "funded" IZ changes in the past year, there is very limited data on their effectiveness so far.

There is disagreement over whether Pittsburgh's IZ program should be treated as "funded" given the City's overhaul of its tax abatement programs, which increased maximum benefits and expanded eligibility citywide. These abatements have been claimed by and incorporated into the financing of active IZ projects, undermining the notion that Pittsburgh's current IZ requirements are completely unfunded. However, there has been equally insufficient evidence to demonstrate that Pittsburgh's current funding schemes – including a mix of tax abatements and Housing Choice Voucher eligibility – have enabled developers to reach a revenue equivalent as market-rate rent and build affordable units at-scale in existing IZ neighborhoods.

Should Pittsburgh leaders decide to pursue improvements to the current financial incentive structure, Portland and Baltimore's funding models demonstrate the importance of a carefully planned and centrally administered "funded IZ" program. While the former targets developer costs too broadly and fails to track foregone tax revenues, the latter takes a more precise approach that directly ties approved benefits to developers' actual lost revenues.

In the interim, it's critical that city leaders closely monitor year-to-year construction trends and changes to neighborhood demographics where IZ is now in place. **Option 1** aims to better inform this debate so local policymakers can determine the appropriate level of fiscal support to IZ projects.

"Funded IZ" in Portland and Baltimore

Portland, Oregon passed its first iteration of inclusionary zoning in 2016. In the following five years, the city permitted a total of 1,313 inclusionary units in 92 projects. While the program included a 10-year property tax exemption on the residential portion of affordable housing projects, this was mostly focused on the downtown neighborhood with very limited benefits elsewhere.

The number of apartments permitted by Portland dropped precipitously after 2017 and housing affordability continued to worsen. The Portland Housing Bureau subsequently engaged BAE Urban Economics to analyze the impact of the foregone revenue from existing exemptions. The researchers found that the exemption was sufficient to offset the costs of reduced rents in the downtown area, but reduced exemptions elsewhere led to an “imbalance” that constrained potential development.¹²

BAE researchers recommended expanding downtown's exemption to other high-cost neighborhoods across the city, an approach Portland's City Council adopted in March 2024 as part of an overhaul of its IZ program. The new “funded” program includes a 10-year property exemption available to affordable housing projects citywide (requiring household eligibility at or below 60% of AMI).

There is also no cap on the exemption, which takes the form of the City's Multiple-Unit Limited Tax Exemption (MULTE) program under Chapter 3.103 of the Portland City Code. Under the prior IZ program, property tax exemptions were subject to an overall “foregone revenue cap” that served as a fiscal backstop against runaway costs. Council waived the cap until the end of 2029, meaning there is no limit to how much the City may spend on exemptions in any given year until then.

This approach has drawn its own set of criticisms, mostly for its lack of fiscal transparency and accountability. One local reporter attempted to submit a records request from the Portland Housing Bureau (PHB) showing how much public revenue the city foregoes through its IZ program.¹³ Despite being program's administrating entity, the Bureau responded by recommending that she spread her request between three separate agencies. In each response, the documents provided failed to answer her question, instead offering rough estimates and examples from individual projects. After further pressing the PHB to provide a direct answer, an official confirmed through a phone call that the city does not track the program's foregone revenue in a centralized manner and “if PHB were to fulfill the request, which it was unable to do, it would cost [the requester] ‘several thousands to over \$10,000 on a 50% deposit.’”

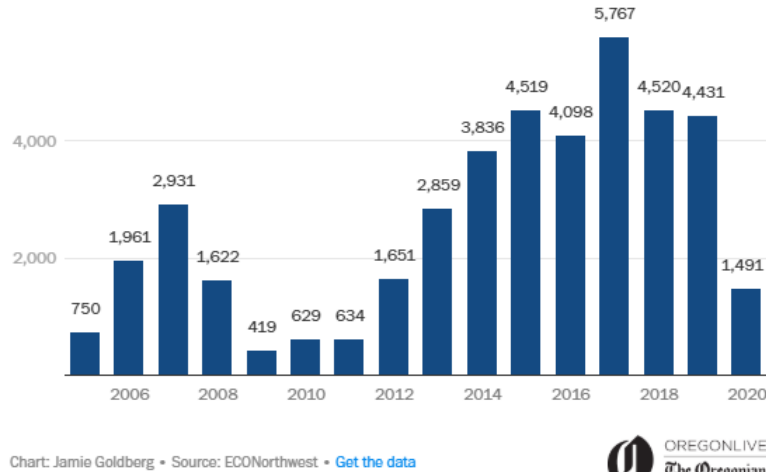
¹² Matt Kowta and Matt Fairris, “Memorandum: Portland Inclusionary Housing Calibration Study – Foregone Revenue Analysis.” BAE Urban Economics. Nov. 3, 2023. <https://www.sightline.org/wp-content/uploads/2024/01/Portland-Inclusionary-Housing-BAE-Forgone-Revenue-Analysis-Nov-2023.pdf>

¹³ Kimberly Cortez, “City of Portland doesn't know how much money its affordable housing program saved developers.” *Street Roots*. Aug. 14, 2024. <https://www.streetroots.org/news/2024/08/14/city-portland-estimates-doesnt-track-how-much-money-it-lets-developers-save-through>

Figure 6

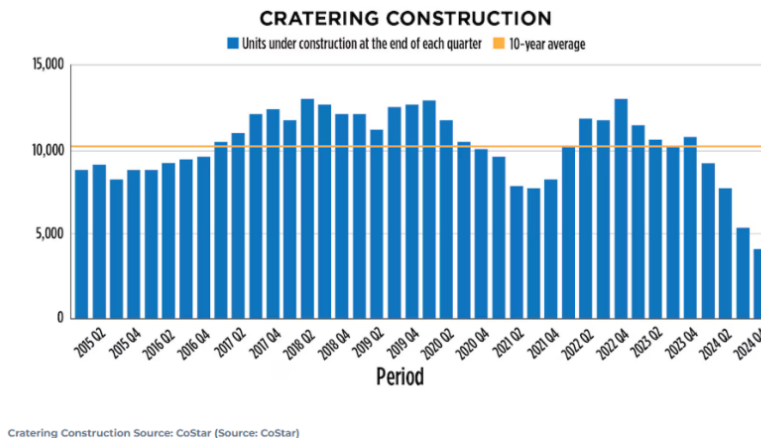
Portland multifamily building permits issued

The number of multifamily permits issued dropped by two-thirds in Portland last year.



Source: OregonLive, "Portland apartment construction faces steep falloff, outpacing other cities" (Mar. 23, 2021)

Figure 7



Source: Willamette Week, "Portland apartment construction falls to lowest level in more than a decade" (Mar. 19, 2025)

Portland is thus unable to quantify total tax benefits provided developers while simultaneously weakening its ability to make accurate revenue projections. A better balance of priorities would provide public support to alleviate the ongoing housing crisis while maintaining responsible stewardship of tax dollars.

Baltimore's approach of directly tying developer costs to tax exemptions may be a more reasonable and cost-effective one. Baltimore's first inclusionary zoning program was enacted in 2007 but was widely criticized for producing only 34 units in the following 15 years. The program's accompanying Inclusionary Housing Offset Fund was chronically underfunded and ineffective, providing only waivers during its existence rather than actual financial support. In January 2024, city leaders replaced the expiring base IZ program with a new one, addressing the issues that caused the former to fail.¹⁴

Baltimore's City Council paired the new program with funding in the form of a High-Performance Inclusionary Tax Credit. Rather than setting a capped abatement or exempting entire properties from the tax base, **the credit is set to equal the revenue difference between market-rate and affordable unit rents.** In doing so, Baltimore's funded IZ model aims to ensure that a project's net operating income is no different than if all units were market-rate. The credit is available citywide and designed to reach virtually all projects with 20 or more units that include at least 10% affordable units at varying low-income levels.

The available credit is calculated with documentation provided by the developer in the required Inclusionary Housing Plan. According to the city's draft Inclusionary Housing Program Manual, the project's finances are verified by requiring an independent accountant not affiliated with the developer to prepare: 1) an accounting of the monthly rent collected for each inclusionary unit for the reporting period and 2) a comparison between the inclusionary unit rent collected and the market rate for that unit.¹⁵

This policy design has its own imperfections. For one, developers must write off their losses from reduced rents until claiming and receiving the credit the following tax year. They must submit an Inclusionary Housing Plan when applying for a permit, which cannot be issued until the City's Housing Commissioner approves the plan, as well as detailed compliance reports on an annual basis. Without proper staffing, training, and administration, imposing new requirements risk worsening supply bottlenecks. In addition, the credit does not account for administrative expenses or vacancies that property owners may incur.¹⁶

Like Portland, Baltimore's "funded" IZ program is still in its infancy and has only been fully operational since July 2024 -- far too early to draw conclusions from. Even so, this model of matching developers' actual costs to public support provided may be a more optimal one if Pittsburgh leaders seek improvements on the City's existing IZ and tax abatement programs. This should only be pursued, however, if systems and procedures are in place to track every tax dollar spent or foregone in a centralized manner.

¹⁴ Maryland Inclusive Housing, "Baltimore City Council Passes Inclusionary Housing Legislation." n.d. https://mih-inc.org/news/baltimore-city-council-passes-inclusionary-housing-legislation/?utm_source=chatgpt.com

¹⁵ Baltimore City Department of Housing & Community Development, "Ordinance 24-308: Inclusionary Housing for Baltimore City Program Guidelines (Working Draft)." DHCD. August 15, 2024. [https://dhcd.baltimorecity.gov/sites/default/files/DRAFT%20Inclusionary%20Housing%20Program%20Manual%20-%20updated%2008-15-2024%20\(1\).pdf](https://dhcd.baltimorecity.gov/sites/default/files/DRAFT%20Inclusionary%20Housing%20Program%20Manual%20-%20updated%2008-15-2024%20(1).pdf)

¹⁶ Jon M. Laria and Alyssa Domzal, "New Inclusionary Housing Mandates for Baltimore City." Ballard Spahr. December 11, 2023. <https://www.ballardspahr.com/insights/alerts-and-articles/2023/12/new-inclusionary-housing-mandates-for-baltimore-city>

City of Pittsburgh Tax Abatements

A tax abatement reduces a property owner's tax bill in exchange for improvements made to their property. Abatements benefit local governments by incentivizing the transformation of unproductive properties into tax-generating ones, strengthening the tax base and producing more revenue in the long-run. Historically, the City of Pittsburgh's tax abatement programs have focused only on blighted areas. In 2020, however, seven abatement programs were consolidated into four programs, expanded citywide, and restructured to address new priorities.

One of those priorities was a growing need for affordable housing. In 2016, the Affordable Housing Task Force, created by city leaders to investigate and propose solutions to the local affordable housing crisis, released recommendations that included aligning city abatement programs with housing goals.¹⁷

City Ordinances 29 and 30 of 2019 (amended in 2020 via Ordinance 13) overhauled the existing abatement program design with changes taking effect on July 1, 2020. Under the new structure, all programs are available to property owners anywhere in the City, with higher benefits if the project takes place in either a Community Development Block Grant (CDBG) area or the Lower Hill District. Previous "phase-down" periods were also eliminated, allowing recipients to claim the full abatement throughout the entire benefit duration period.

The figure below summarizes the main components of the three most common abatements.¹⁸ Each abatement has an "Enhanced" component for those meeting affordable unit creation targets. The City's tax abatement programs are managed and overseen by the Department of Finance.

¹⁷ Affordable Housing Task Force, "Findings and Recommendations to Mayor William Peduto and the Pittsburgh City Council." City of Pittsburgh. May 2016. [https://apps.pittsburghpa.gov/mayorpeduto/FinalReport_5_31_16_\(1\).pdf](https://apps.pittsburghpa.gov/mayorpeduto/FinalReport_5_31_16_(1).pdf)

¹⁸ The fourth, for "Visitability Design", has not been claimed as of the City Controller's most recent fiscal audit.

Figure 8

City Of Pittsburgh Summary of Amended Tax Abatement Programs

The City of Pittsburgh has consolidated and replaced several real estate tax abatement programs (Act 42, Local Economic Revitalization Tax Act/LERTA, Local Economic Stimulus, and Visitability) effective July 1, 2020. The amended abatements are available city-wide with incentives for affordable housing, job creation, and/or investing in distressed (CDBG-eligible) areas or the Lower Hill District by offering longer and higher-value abatements to projects meeting certain requirements.

Project Type	Abatement Type	Standard Abatement	Enhanced Abatement	Legislation
Owner-occupied residential/for-sale development	Assessment reduction	3-year assessment reduction - Up to \$175,000 per year	10-year assessment reduction - Up to \$250,000 per year if: - A residential for-sale or owner-occupied property is in a CDBG-eligible location OR - A multi-unit for-sale or owner-occupied development includes at least 10% of units affordable to and occupied by households at or below 80% AMI OR - A for-sale or owner-occupied property is located in the Lower Hill District	Chapter 265
Commercial residential (rental or otherwise not occupied by the owner)	Tax credit	3-year tax credit - Up to \$125,000 per year	10-year tax credit - Up to \$250,000 per year if: - A residential property not to be occupied by the property owner includes at least 10% of its units affordable to and occupied by households at 50% AMI OR - A residential property not to be occupied by the property owner includes at least 60% of its units affordable to and occupied by households at 80% AMI OR - A residential property not to be occupied by the property owner is located in the Lower Hill District	Chapter 267
Industrial, commercial, or other business structures	Tax credit	3-year tax credit - Up to \$125,000 per year	10-year tax credit - Up to \$250,000 per year if the project creates at least 50 full-time jobs	Chapter 267

Source: City of Pittsburgh Department of Finance

The post-consolidation abatement most likely to be claimed by IZ rental projects is **Commercial Residential (Enhanced)**, since its requirements align with existing IZ rules: at least 10% of units are affordable to and occupied by households at 50% AMI. If an IZ project involves homeownership, the developer would likely claim the **Owner-Occupied Residential/For-Sale Development (Enhanced)** abatement, though these projects are far less common at the scale needed to trigger IZ requirements. Under both programs, a developer that meets affordable unit requirements is eligible for either an assessment reduction (tax decrease of \$250,000) or tax credit of up to \$250,000 annually for 10 years (\$2,500,000 total maximum).

Supporters of inclusionary zoning argue that these incentives are how we (at least partially) fund the costs imposed on developers with affordable unit requirements.

As the only IZ project open and occupied to date, Arsenal 201 Phase II can serve as an example showing how available financing sources may or may not bridge funding gaps. According to the Department of Finance, parcel 49-E-132, encompassing the Phase II site, has received two abatements: **Residential LERTA** (Local Economic Revitalization and Tax Assistance) from the School District and **Chapter 267 Commercial Residential** from the City. Our researchers confirmed with Allegheny County Economic Development staff that there is no active abatement at the County level for that parcel, nor was an application ever submitted. This aligns with public materials presented by Arsenal 201's developers.

In a presentation given to the Pittsburgh Public School Board requesting a LERTA abatement on school property taxes, the developers noted that the project would not be economically feasible without receiving tax abatements due to a \$3 million funding gap that affordable units' lowered rents would leave.¹⁹ The figure below shows *theoretical* future property values and revenues received by the school district. In total, LERTA would provide about **\$1.8 million in tax savings** over its 10-year period – the difference between what the property owner theoretically would have paid without the abatement and the amount they actually did.

Figure 9

School Projected				
Year	Total Assessed Value	Gross Property Taxes	LERTA	Net Property Taxes w/LERTA
1	\$ 2,235,500.00	\$ 21,997.32	\$ (19,797.59)	\$ 2,199.73
2	\$ 2,235,500.00	\$ 21,997.32	\$ (19,797.59)	\$ 2,199.73
3	\$ 2,235,500.00	\$ 21,997.32	\$ (17,597.86)	\$ 4,399.46
4	\$ 61,772,028.00	\$ 607,836.76	\$ (250,000.00)	\$ 357,836.76
5	\$ 61,772,028.00	\$ 607,836.76	\$ (250,000.00)	\$ 357,836.76
6	\$ 61,772,028.00	\$ 607,836.76	\$ (250,000.00)	\$ 357,836.76
7	\$ 61,772,028.00	\$ 607,836.76	\$ (250,000.00)	\$ 357,836.76
8	\$ 61,772,028.00	\$ 607,836.76	\$ (250,000.00)	\$ 357,836.76
9	\$ 61,772,028.00	\$ 607,836.76	\$ (250,000.00)	\$ 357,836.76
10	\$ 61,772,028.00	\$ 607,836.76	\$ (250,000.00)	\$ 357,836.76
10 Year Total	\$ 43,911,069.60	\$ 4,320,849.28	\$ (1,807,193.03)	\$ 2,513,656.25
Year 11 and Forward	\$ 61,772,028.00	\$ 607,836.76	\$ -	\$ 607,836.76

Source: Milhaus presentation to PPS, "LERTA Request to Pittsburgh Public School Board"

Milhaus's revenue gap due to the inclusion of affordable units can alternatively be approximated using available rental data from Phase II. Shown in **Table 17** are the six floorplans available for affordable units. Their rental costs are shown in comparison to their market-rate counterparts, recalling that under the IZ ordinance, affordable units must be equivalent in all ways including square footage. The difference between these two sets of rents (market-rate and affordable) were multiplied by the total number of affordable units that exist for each floorplan, then by twelve to calculate the resulting annual gap.

When more than one unit for a floorplan was listed and their rents varied, an average was taken. When only one unit for a floorplan was listed, that rent was used. There were no market-rate Irwin units listed as available; since the Vann model was closest in size but still smaller (411 square feet vs. 437 square feet), the high end on the range of Vann rents was used (\$1,325).

The total number of affordable units for each floorplan was estimated using Milhaus's presentation to PPS. Of the 35 total affordable units at Phase II, they planned to include four micro units, eight studio units, 16 one-bedroom units, and seven two-bedroom units in the completed property. No distinction is made between micro and studio units on Milhaus's listings, so these were grouped into one category of 12 studio units (Irwin floorplan). The 16 one-

¹⁹ Milhaus, "Arsenal 201 – LERTA Request to Pittsburgh Public School Board." n.d.
<https://resources.finalsite.net/images/v1721323206/pghschoolsorg/vdh2waackj957ldhjh11b/arsenal-phaselertapresentation3.pdf>

bedroom units were distributed evenly between the four one-bedroom affordable floorplans (Stein, Rogers, Murphy, and Rooney), while all seven two-bedroom units were allocated to the only affordable floorplan available at that size (Gibson).

Table 17

Estimated Revenue Gap from Affordable Units at Arsenal 201 Phase II								
Unit Floorplan Name	Number of Bedrooms	Square Footage	Rent: Market-Rate	Rent: Affordable	Monthly Rental Gap (Difference)	Annual Rental Gap (x 12)	Est. # of Affordable Unit Types	Total Gap Across Unit Type
Irwin	Studio	437	\$1,325	\$830	\$495	\$5,940	12	\$71,280
Stein	1	506-630	\$1,583	\$830	\$753	\$9,036	4	\$36,144
Rogers	1	649	\$1,994	\$889	\$1,105	\$13,260	4	\$53,040
Murphy	1	684-732	\$2,030	\$889	\$1,141	\$13,692	4	\$54,768
Rooney	1	732	\$1,980	\$889	\$1,091	\$13,092	4	\$52,368
Gibson	2	998-1068	\$2,061	\$1,067	\$994	\$11,928	7	\$83,496
Total Gap Between Market-Rate and Affordable-Rate Units:								\$351,096

Based on this estimate, affordable units can be expected to generate *at least* a **\$351,096** rental revenue gap (or around \$3.5 million over 10 years) for Phase II – without including other factors like operating expenses and vacancy rates. This roughly aligns with what Milhaus reported to PPS in their abatement request: “As a result of providing these affordable units, Milhaus has committed to a reduction in gross revenue of an estimated **\$455,676** annually.”

Table 18 below shows potential benefits accumulated by abatements available from the City of Pittsburgh and Pittsburgh Public Schools using Arsenal 201 Phase II as an example.

According to the City’s Department of Finance, an approved tax abatement is only activated after there is an increase in the building value. If there is no increase, Finance assumes no work has occurred. When improvements do occur, the total abatement received depends on the property’s starting value. Unfortunately, historical property values for the parcel encompassing Arsenal 201 Phase II were not available on the County’s Real Estate Portal beyond the previous two years or from the Department of Finance. Instead, we assume a starting value of \$1,000,000 as a general approximation.

Department of Finance staff confirmed that \$48,331,200 is the property’s currently assessed value despite the increase to \$61.7 million that Arsenal’s developers assumed in their presentation to PPS officials. Given that Phase II completed construction and opened in 2022, it’s unlikely to reach higher values through new construction. For simplicity, **Table 18** sets the property’s value at \$48.3 million for all ten years of the abatement schedule. Staff confirmed that the property has been receiving the maximum abatement (\$250,000) for both city and school district taxes since 2023.

Staff also noted that while PPS's abatement program includes a step-down schedule (i.e., incrementally reducing maximum abatement benefits over time), the school district often signs a memorandum of understanding with the developer to eliminate it and ensure the maximum benefit can be claimed in all ten years. Given the size of Arsenal 201 Phase II, we assume the step-down schedule has been waived for the school district abatement.

Finally, it should be noted that the City's abatements apply not only to the City Real Estate Tax, but also the Carnegie Library Real Estate Tax and Parks Tax. Given the relatively low millage rates of the latter two (0.25 mills and 0.50 mills, respectively), **Table 18** focuses only on abatements for the City and School District's property taxes. For columns showing taxes owed, the City rate of 8.06 mills and the School District rate of 10.25 mills were used.

Table 18

Illustrating the 10-Year Benefits of City & School District Tax Abatements							
Year	Total Assessed Value	City Tax Owed (No Abatement)	Total Ch. 267 Enhanced Benefit (City)	City Tax Owed (Post-Abatement)	School Tax Owed (No Abatement)	Total LERTA Benefit (School)	School Tax Owed (Post-Abatement)
0	\$1,000,000	--	--	--	--	--	--
1	\$48,331,200	\$389,549	\$250,000	\$139,549	\$495,395	\$250,000	\$245,395
2	\$48,331,200	\$389,549	\$250,000	\$139,549	\$495,395	\$250,000	\$245,395
3	\$48,331,200	\$389,549	\$250,000	\$139,549	\$495,395	\$250,000	\$245,395
4	\$48,331,200	\$389,549	\$250,000	\$139,549	\$495,395	\$250,000	\$245,395
5	\$48,331,200	\$389,549	\$250,000	\$139,549	\$495,395	\$250,000	\$245,395
6	\$48,331,200	\$389,549	\$250,000	\$139,549	\$495,395	\$250,000	\$245,395
7	\$48,331,200	\$389,549	\$250,000	\$139,549	\$495,395	\$250,000	\$245,395
8	\$48,331,200	\$389,549	\$250,000	\$139,549	\$495,395	\$250,000	\$245,395
9	\$48,331,200	\$389,549	\$250,000	\$139,549	\$495,395	\$250,000	\$245,395
10	\$48,331,200	\$389,549	\$250,000	\$139,549	\$495,395	\$250,000	\$245,395
10-Year Total	--	\$3,895,49	\$2,500,00	\$1,395,49	\$4,953,95	\$2,500,00	\$2,453,95

Under this scenario, the property owners of Arsenal 201 Phase II would receive \$2.5 million in tax relief from both the City and the School District over ten years, or \$5 million total, though actual benefits may have been smaller due to more incremental increases to the assessed value.

Housing Choice Voucher Payment Standards

Inclusionary Zoning advocates also point to the Section 8 Housing Choice Voucher (HCV) Program as a valuable financing source that both deepens unit affordability for tenants and provides a steady source of rental revenue for landlords and property owners. IZ unit owners have the option of committing to accept HCV recipients from the HACP, which will then refer eligible households from their waitlist when a vacancy opens for an affordable unit. How well the HACP's **voucher payment standards** meet local market needs is the subject of this section.

Under the HCV program, low-income households are eligible for a portable rental subsidy in the form of a voucher. The recipient must then find an eligible unit and a landlord willing to accept the voucher within a set timeframe. The program is structured to cap total rent and utilities paid by the recipient household at 30% of their monthly income in most cases.

However, to conserve overall funding and the number of households the program is able to reach, public housing agencies (PHAs) like the HACP set voucher payment standards, which set a maximum rent the agency is willing to accept on behalf of the tenant. Maximums increase with unit size, measured by number of bedrooms. In certain cases, the PHA may allow rent and utility costs that exceed the payment standards, but any additional costs fall on the tenant and are likely to result in monthly payments exceeding 30% of their income.

In 2019 and 2022, the HACP overhauled its single citywide voucher payment standards in favor of a tiered system of assigning payment standards based on the census tract the unit is located in. According to the HACP, citywide payment standards incentivized voucher holders to live in low-cost, high-poverty neighborhood where subsidies had the farthest reach.

Under the current system, the HACP uses the American Community Survey's 5-year estimates to determine each census tract's Median Gross Rent (MGR) for all bedroom sizes. How far above or below this value falls from the HUD hypothetical Allegheny County Fair Market Rent (ACFMR) determines which tier the census tract is classified into. Even at Tier 6, which provides the lowest subsidy, the resulting payment standard is set at 110% of the ACFMR. Landlords accepting a reasonable accommodation (which provides equal access for those with disabilities) receive a 10% boost to their assigned payment standard. How each tier's payment standards are calculated is shown in **Figure 10**, while a breakdown of the number of tracts in each tier is shown in **Figure 11**. The resulting monetary values, which must be updated each year, are shown for the current year in **Figure 12**.

Figure 10

Tier Number	Percent of ACFMR	Adjusted Percent of ACFMR (for Reasonable Accommodations)
1	160%	170%
2	150%	160%
3	140%	150%
4	130%	140%
5	120%	130%
6	110%	120%

HACP Voucher Payment Standard Calculations by Tier

Figure 11

Tier	Sort Condition (tract MGR/County MGR)	Percent above ACFMR	Number of HACP Tracts/Tier	Percent of HACP Tracts/Tier
6	>= 1.01, <= 1.1 of AC MGR	110%	91	66%
5	>= 1.11, <= 1.2 of AC MGR	120%	10	7%
4	>= 1.21, <= 1.3 of AC MGR	130%	12	9%
3	>= 1.31, <= 1.4 of AC MGR	140%	3	2%
2	>= 1.41, <= 1.5 of AC MGR	150%	2	1%
1	>= 1.51 of AC MGR	160%	19	14%

Citywide Distribution of HACP Voucher Payment Standards by Tier

Figure 12




TIERED
VOUCHER PAYMENT STANDARDS (VPS)
EFFECTIVE 1/1/2025

TIER	Bedroom Size						
	EFF	1 BR	2 BR	3 BR	4 BR	5 BR	6 BR
1	1,840	1,970	2,360	3,010	3,243	3,730	4,216
2	1,725	1,847	2,213	2,822	3,041	3,497	3,953
3	1,610	1,723	2,065	2,633	2,838	3,263	3,689
4	1,495	1,600	1,918	2,445	2,635	3,030	3,426
5	1,380	1,477	1,770	2,257	2,432	2,797	3,162
6	1,265	1,354	1,623	2,069	2,230	2,564	2,899

2025 Monetary Limits for HACP Voucher Payment Standards by Tier

To determine whether the HACP's voucher payment standards are set at levels that meet local rental market costs, we compared their values in all 128 census tracts across the city to the *all-bedroom* median gross rent (MGR) for each corresponding tract. Ideally, an exact comparison would use the payment standards and MGR for each bedroom size as opposed to the all-bedroom value. However, the amount of Census data available at those levels was insufficient to draw conclusions from. Since efficiency, one-bedroom, and two-bedroom units are likely closest to tracts' median gross rent (and most likely to be impacted by payment standards set too low), only those unit types were compared.

Table 19 shows the results of our analysis. In 97 out of 128 tracts, the assigned payment standards for efficiency-sized units exceeded its corresponding census tract's median gross rent. In other words, in 75.7% of census tracts across the city, the HACP's assigned voucher payment standards would cover more than half of all rental units without incurring additional costs on the voucher holder. In 15 cases (11.7%), the payment standard for efficiency-sized units fell below the census tract's median gross rent. There was insufficient data at the all-bedroom level in 16 total census tracts.

Values increased for one-bedroom and two-bedroom units, which is to be expected since the payment standard maximums increase with bedroom size. The full data can be found in the **Appendix**.

Table 19

HACP Voucher Payment Standards (VPS) Compared to Census Tract's All-Bedroom Median Gross Rent (MGR)			
Unit Size	Total Tracts: VPS Over MGR	Total Tracts: VPS Under MGR	Total Tracts: Insufficient Data
Efficiency	97 (75.8%)	15 (11.7%)	16 (12.5%)
One-Bedroom	104 (81.3%)	8 (6.3%)	16 (12.5%)
Two-Bedroom	112 (87.5%)	0 (0%)	16 (12.5%)

Though MGR data for individual unit sizes was insufficient at the tract level, their margins of error were much smaller at the citywide level, as shown in **Table 20**. In all 128 tracts (encompassing each tier and unit size), the assigned voucher payment standards exceeded the citywide median gross rent for corresponding unit sizes. In other words, the payment standards are set at levels that would cover most rental units citywide. As stated, this does not capture neighborhood-level cost differences. More research is needed to compare payment standards to each tract's MGR by unit size.

Table 20

HACP Voucher Payment Standards (VPS) Compared to Citywide Median Gross Rent by Unit Size						
	All Bedrooms	Efficiency	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
MGR Pittsburgh (All Tracts)	\$1,221 (± \$17)	\$1,109 (± \$50)	\$1,079 (± \$23)	\$1,269 (± \$39)	\$1,450 (± \$41)	\$1,605 (± \$164)
Total Tracts: VPS Above MGR	--	128 (100%)	128 (100%)	128 (100%)	128 (100%)	128 (100%)
Total Tracts: VPS Below MGR	--	0	0	0	0	0

One can infer that the HACP's current voucher payment standards are set at levels that generally "meet the market" by covering most rental units, though more research is needed on the affordability of family-sized units and those with reasonable accommodations.

Project-Based Vouchers

Another Section 8 subsidy available to developers of new rental units are Project-Based Vouchers, or PBVs. Unlike Housing Choice Vouchers, which follow households as they move between units, PBVs remain tied to a specific unit. When a family moves from a PBV-subsidized unit, they are not always guaranteed continued assistance (though there are exceptions, particularly related to public housing conversions).

Since 2010, federal policy has incentivized public housing agencies to expand the use of PBV subsidies. The HACP has embraced this option through its unique flexibilities as a Moving to Work agency and a nonprofit subsidiary called Allies and Ross Management Development Corporation (or ARMDC) that drives its development program. A more in-depth exploration of this topic can be found in the City Controller's 2025 Special Report on the HACP.

PBV subsidies are advantageous to Housing Choice Vouchers in some respects that may be enticing to developers and property owners. Studies by HUD and its partners have generally shown longer tenure and less frequent turnover in PBV units as compared to Housing Choice Voucher units, likely due to their structure as a unit-specific subsidy that a household loses if they move.²⁰ Housing Choice Vouchers, by contrast, are designed to be portable and do penalize recipients for moving.

As discussed, the maximum rent the HACP will accept for an HCV unit is determined by its voucher payment standards. For PBV units, public housing agencies can accept a rent of up to 110% of the local Fair Market Rent (FMR) or elect to use another HUD-approved exemption payment standard. This increases to 120% of the FMR for units meeting the needs of those with

²⁰ Mary Cunningham and Molly M. Scott, "The Resident Choice Option: Reasons Why Residents Change from Project-Based Vouchers to Portable Housing Vouchers," p. 4. Urban Institute. June 2010.
<https://www.urban.org/sites/default/files/publication/28761/412121-The-Resident-Choice-Option-Reasons-Why-Residents-Change-from-Project-Based-Vouchers-to-Portable-Housing-Vouchers.PDF>

disabilities. As of 2024, when the HACP last released a request for proposals from developers for PBV units, the Housing Authority outlined its payment policy:

"The amount of the rent to owner is determined in accordance with HUD regulations. The rent to owner including any applicable tenant utility allowances must not exceed the lowest of:

- i. An amount determined by HACP, **not to exceed 110 percent of the Metropolitan Statistical Area Fair Market Rent (MSAFMR)** for the unit bedroom size including any applicable tenant paid utility allowance;
- ii. For units meeting the Uniform Federal Accessibility Standards (UFAS), an amount determined by HACP, not to exceed 120 percent of the Metropolitan Statistical Area Fair Market Rent (MSAFMR) for the unit bedroom size including any applicable tenant-paid utility allowance;
- iii. The reasonable rent; or
- iv. The rent requested by the owner."

The Pittsburgh, PA HUD Metro Area consists of the following counties: Allegheny, Beaver, Butler, Fayette, Washington, and Westmoreland.

HUD allows PHAs to apply the Small Area Fair Market Rent (or SAFMR, equivalent to zip code geographies) instead if they are doing so under other tenant-based programs. However, the HACP notes in its PBV applications that it is not doing so at this time. Recall that under its HCV program, the HACP uses a unique payment standards system that captures markets more locally (at the census tract level) than even the SAFMR would achieve.

In **Table 21**, we use Lawrenceville to demonstrate how using each of these three options (MSAFMR, SAFMR, and tract-level data) result in differing levels of maximum acceptable rent on behalf of eligible tenants.

Table 21

Comparison of Maximum Accepted Rents in Lawrenceville Based on Metric Used						
		Efficiency	1-Bedroom	2-Bedroom	3-Bedroom	4-Bedroom
Pittsburgh MSAFMR	Baseline	\$998	\$1,068	\$1,280	\$1,632	\$1,759
SAFMR (Zip Code: 15201)	Baseline	\$1,310	\$1,400	\$1,680	\$2,140	\$2,310
	At 110% Payment Standard	\$1,441	\$1,540	\$1,848	\$2,354	\$2,541
Voucher Payment Standards	Census Tract 603	\$1,725	\$1,847	\$2,213	\$2,822	\$3,041
	Census Tract 901	\$1,610	\$1,723	\$2,065	\$2,633	\$2,838
	Census Tract 902	\$1,380	\$1,477	\$1,770	\$2,257	\$2,432
	Census Tract 1011	\$1,610	\$1,723	\$2,065	\$2,633	\$2,838

Obviously, the Small Area FMR permits higher rents than the Metro Area FMR, which encompasses a very large geography. However, the HACP's Housing Choice Voucher payment standards remain stronger and beat the Small Area FMR in three out of four cases even when using the 110% standard. The only exception is Census Tract 902, which encompasses the hilliest portion of Lawrenceville to the east of 40th and Butler Street. Its steep topography is a likely challenge for the types of large housing development projects that would utilize PBVs.

The higher financial benefit available under the HACP's new payment standards may be one reason that multiple pending projects in Lawrenceville have committed to accepting Housing Choice Vouchers as their preferred subsidy source over PBVs. Even if the HACP were to adopt Small Area Fair Market Rents as their payment standard for PBV units, tract-level HCV standards would remain preferable to developers in most cases.

The HACP was able to adopt its unique HCV payment standards system through its flexibilities as a HUD-approved Moving to Work agency. One way the HACP could equalize the financial advantage that Housing Choice Vouchers offer over PBVs would be to seek HUD approval to apply the same payment standards system across both programs. Though more research is needed to determine the feasibility of this option under existing federal regulations, HUD's guidance for PBV flexibilities under the Moving to Work Demonstration seems to suggest that agencies like the HACP have broad leeway to design local payment systems under *both* Section 8 programs (see **Figure 13**).

Figure 13

9.g. Increase PBV Rent to Owner
<u>Activity</u> 9.g. Increase Rent to Owner (HCV) The agency is authorized to develop a local process to determine the initial and re-determined rent to owner. <u>Statutes and Regulations Waived</u> Increase Rent to Owner (HCV) See MTW Waiver #2.a. and 2.b. "Payment Standards" and associated activities, statutes and regulations waived, and safe harbors. <u>Safe Harbor(s) - 9.g.</u> i. Any policy must comply with rent reasonableness, unless modified by waiver(s) 2.c. and/or 2.d.*

Source: HUD Exchange, MTW Expansion Training, Project-Based Voucher Program Flexibilities

Low Income Housing Tax Credits (LIHTC)

The Low-Income Housing Tax Credit is administered by the IRS at the federal level and the Pennsylvania Housing Financing Agency (PHFA) at the state level. Under PA requirements, eligible housing projects must include either a minimum of 20% of units affordable at 50% AMI or 40% of units affordable at 60% AMI.

Like traditional housing programs, rent and utilities must be capped at 30% of monthly income. In addition, PHFA's Qualified Allocation Plan (QAP) offers higher scores to projects that meet certain criteria (located in a Qualified Census Tract, rural/underserved, assisting vulnerable populations). Projects must demonstrate a financing gap that necessitates LIHTC assistance and PHFA must review the proposed budget to ensure cost reasonableness. Recipients then must sell the tax credits to investors (including banks, which use LIHTC investments to fulfill Community Reinvestment Act requirements) in exchange for equity in the project, providing the financing developers need to realize the project and its affordability requirements.

Annual LIHTC allocations are limited by federal law, making it highly competitive among applicants. The LIHTC generally favors larger projects since they can harness economies of scale and generate a greater impact with tax dollars. Small-scale developers are less likely to have the expertise needed to navigate the complex application process or the capital needed for up-front compliance costs.

A full list of LIHTC projects awarded since 2010, using HUD data, can be found in the **Appendix**. One point of note: of the 40 LIHTC projects identified, all but one opted to use the 60% AMI affordability standard (requiring at least 40% of units to be affordable) as opposed to the 50% AMI standard that Pittsburgh's IZ ordinances require for applicable projects. Overall, LIHTC financing is important in some projects, but isn't a guaranteed source of financing as the City's existing tax abatement program is currently structured.

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Appendix A

HACP's 2025 Voucher Payment Standards Compared to the All-Bedroom Median Gross Rent (MGR) In Pittsburgh Census Tracts							
Census Tract	Neighborhood	All-Bedroom MGR	Margin of Error ($\pm$)	2025 VPS Tier	VPS: Effic.	VPS: 1-BR	VPS: 2-BR
103.01	Bluff	-	**	6	\$1,265	\$1,354	\$1,623
103.02	Bluff	\$1,677	\$407	2	\$1,725	\$1,847	\$2,213
201	Central Business District	\$1,671	\$81	2	\$1,725	\$1,847	\$2,213
203	Strip District	\$2,225	\$93	1	\$1,840	\$1,970	\$2,360
305	Crawford-Roberts-Historic Lower Hill	\$1,259	\$273	6	\$1,265	\$1,354	\$1,623
402	Terrace Village-West Oakland	\$1,432	\$78	3	\$1,610	\$1,723	\$2,065
404	North Oakland	\$1,248	\$122	5	\$1,380	\$1,477	\$1,770
405	Central Oakland	\$1,250	\$285	4	\$1,495	\$1,600	\$1,918
406	Central Oakland	\$1,500	\$267	4	\$1,495	\$1,600	\$1,918
409	South Oakland	\$1,517	\$457	3	\$1,610	\$1,723	\$2,065
501	Middle Hill	\$681	\$184	6	\$1,265	\$1,354	\$1,623
506	Upper Hill	\$918	\$181	6	\$1,265	\$1,354	\$1,623
509	Bedford Dwellings	\$538	\$235	6	\$1,265	\$1,354	\$1,623
510	Terrace Village	\$634	\$284	6	\$1,265	\$1,354	\$1,623
511	Terrace Village	\$1,040	\$246	6	\$1,265	\$1,354	\$1,623
603	Lower Lawrenceville	\$1,669	\$151	2	\$1,725	\$1,847	\$2,213
605	Polish Hill	\$1,028	\$142	6	\$1,265	\$1,354	\$1,623
703	Shadyside	\$1,485	\$144	3	\$1,610	\$1,723	\$2,065
705	Shadyside	\$1,376	\$69	3	\$1,610	\$1,723	\$2,065
706	Shadyside	\$1,469	\$109	3	\$1,610	\$1,723	\$2,065
708	Shadyside	\$2,123	\$137	1	\$1,840	\$1,970	\$2,360
709	Shadyside	\$1,271	\$88	3	\$1,610	\$1,723	\$2,065
802	Bloomfield	\$1,208	\$83	5	\$1,380	\$1,477	\$1,770
804	Bloomfield	\$1,583	\$259	3	\$1,610	\$1,723	\$2,065
806	Bloomfield	\$1,103	\$226	3	\$1,610	\$1,723	\$2,065
807	Friendship	\$1,233	\$100	3	\$1,610	\$1,723	\$2,065

809	Bloomfield	\$1,126	\$48	6	\$1,265	\$1,354	\$1,623
901	Central Lawrenceville	\$1,570	\$252	3	\$1,610	\$1,723	\$2,065
902	Central Lawrenceville	\$1,250	\$206	5	\$1,380	\$1,477	\$1,770
903	Bloomfield	\$1,126	\$136	6	\$1,265	\$1,354	\$1,623
1005	Stanton Heights	\$1,083	\$143	5	\$1,380	\$1,477	\$1,770
1011	Upper Lawrenceville	\$1,650	\$176	3	\$1,610	\$1,723	\$2,065
1014	Morningside	\$1,087	\$127	5	\$1,380	\$1,477	\$1,770
1018	Stanton Heights	\$1,399	\$412	5	\$1,380	\$1,477	\$1,770
1019	Garfield	\$1,174	\$117	6	\$1,265	\$1,354	\$1,623
1102	Highland Park	\$1,349	\$62	4	\$1,495	\$1,600	\$1,918
1106	Highland Park	\$1,273	\$291	5	\$1,380	\$1,477	\$1,770
1113	East Liberty	\$1,095	\$92	5	\$1,380	\$1,477	\$1,770
1114	Garfield	\$1,083	\$86	5	\$1,380	\$1,477	\$1,770
1115	East Liberty	\$1,221	\$155	5	\$1,380	\$1,477	\$1,770
1203	Lincoln-Lemington-Belmar	\$1,054	\$450	5	\$1,380	\$1,477	\$1,770
1209	Larimer	\$1,410	\$350	5	\$1,380	\$1,477	\$1,770
1302	Homewood North	\$1,236	\$692	3	\$1,610	\$1,723	\$2,065
1306	East Hills	-	**	6	\$1,265	\$1,354	\$1,623
1307	Homewood North-Homewood West	\$668	\$572	5	\$1,380	\$1,477	\$1,770
1308	Homewood South	\$713	\$275	6	\$1,265	\$1,354	\$1,623
1401	Squirrel Hill North	\$1,774	\$98	1	\$1,840	\$1,970	\$2,360
1402	Squirrel Hill North	\$1,199	\$76	3	\$1,610	\$1,723	\$2,065
1403	Squirrel Hill North	\$1,953	\$190	1	\$1,840	\$1,970	\$2,360
1404	Point Breeze	\$2,200	\$1,225	1	\$1,840	\$1,970	\$2,360
1405	Point Breeze North	\$1,520	\$135	1	\$1,840	\$1,970	\$2,360
1408	Squirrel Hill South	\$1,388	\$217	4	\$1,495	\$1,600	\$1,918
1411	Swisshelm Park	\$1,983	\$551	1	\$1,840	\$1,970	\$2,360
1412	Point Breeze-Regent Square	\$1,194	\$102	6	\$1,265	\$1,354	\$1,623
1413	Squirrel Hill South	\$1,362	\$87	5	\$1,380	\$1,477	\$1,770
1414	Squirrel Hill South	\$1,157	\$229	6	\$1,265	\$1,354	\$1,623
1516	Greenfield	\$1,238	\$124	5	\$1,380	\$1,477	\$1,770
1517	Greenfield	\$1,249	\$200	6	\$1,265	\$1,354	\$1,623
1608	South Side Slopes	\$1,192	\$125	4	\$1,495	\$1,600	\$1,918

1609	South Side Flats	\$1,609	\$185	1	\$1,840	\$1,970	\$2,360
1610	Arlington-Arlington Heights-Mt. Oliver-St. Clair	\$931	\$543	6	\$1,265	\$1,354	\$1,623
1702	South Side Flats	\$1,499	\$220	3	\$1,610	\$1,723	\$2,065
1706	South Side Slopes	\$1,236	\$234	4	\$1,495	\$1,600	\$1,918
1803	Allentown	\$1,120	\$172	6	\$1,265	\$1,354	\$1,623
1807	Mount Washington	\$1,397	\$115	5	\$1,380	\$1,477	\$1,770
1903	Mount Washington	\$1,182	\$91	6	\$1,265	\$1,354	\$1,623
1911	Duquesne Heights	\$1,473	\$330	4	\$1,495	\$1,600	\$1,918
1914	Mount Washington	\$1,353	\$275	5	\$1,380	\$1,477	\$1,770
1915	Mount Washington	\$1,410	\$164	6	\$1,265	\$1,354	\$1,623
1916	Beechview	\$1,251	\$146	6	\$1,265	\$1,354	\$1,623
1917	Brookline	\$1,162	\$394	6	\$1,265	\$1,354	\$1,623
1918	Brookline	\$1,179	\$443	6	\$1,265	\$1,354	\$1,623
1919	Brookline	\$1,151	\$103	6	\$1,265	\$1,354	\$1,623
1920	Beechview	\$1,120	\$402	6	\$1,265	\$1,354	\$1,623
2022	Sheraden	\$690	\$269	6	\$1,265	\$1,354	\$1,623
2023	Banksville	\$1,165	\$33	6	\$1,265	\$1,354	\$1,623
2413	Spring Garden-Troy Hill	\$1,586	\$291	3	\$1,610	\$1,723	\$2,065
2509	Fineview	\$589	\$154	6	\$1,265	\$1,354	\$1,623
2602	Perry North	\$1,117	\$118	6	\$1,265	\$1,354	\$1,623
2607	Perry North	\$1,173	\$143	6	\$1,265	\$1,354	\$1,623
2613	Northview Heights-Summer Hill	\$692	\$576	6	\$1,265	\$1,354	\$1,623
2614	Perry South	-	**	6	\$1,265	\$1,354	\$1,623
2615	Perry South	\$1,095	\$208	5	\$1,380	\$1,477	\$1,770
2620	Spring Hill-City View	\$519	\$132	6	\$1,265	\$1,354	\$1,623
2701	Brighton Heights	\$1,137	\$95	6	\$1,265	\$1,354	\$1,623
2703	Brighton Heights	\$987	\$165	6	\$1,265	\$1,354	\$1,623
2708	Brighton Heights	\$924	\$187	6	\$1,265	\$1,354	\$1,623
2716	Marshall-Shadeland	\$1,101	\$56	6	\$1,265	\$1,354	\$1,623
2814	Crafton Heights	\$962	\$60	6	\$1,265	\$1,354	\$1,623
2815	Crafton Heights	\$1,178	\$221	5	\$1,380	\$1,477	\$1,770
2901	Carrick	\$800	\$160	6	\$1,265	\$1,354	\$1,623
2902	Carrick	\$791	\$253	6	\$1,265	\$1,354	\$1,623

2904	Carrick	\$988	\$174	6	\$1,265	\$1,354	\$1,623
3001	Knoxville	\$1,206	\$146	6	\$1,265	\$1,354	\$1,623
3102	Lincoln Place	\$984	\$91	6	\$1,265	\$1,354	\$1,623
3204	Overbrook	\$1,125	\$176	6	\$1,265	\$1,354	\$1,623
3206	Brookline	\$1,099	\$66	6	\$1,265	\$1,354	\$1,623
3207	Overbrook	\$1,293	\$162	4	\$1,495	\$1,600	\$1,918
5619	Lincoln-Lemington-Belmar	\$536	\$89	5	\$1,380	\$1,477	\$1,770
5620	North Oakland	\$1,250	\$89	6	\$1,265	\$1,354	\$1,623
5623	Glen Hazel-Hazelwood	\$594	\$246	6	\$1,265	\$1,354	\$1,623
5624	Beltzhoover-Bon Air	\$976	\$91	6	\$1,265	\$1,354	\$1,623
5625	Esplen-Sheraden	\$1,349	\$327	6	\$1,265	\$1,354	\$1,623
5626	Elliott-West End	\$1,041	\$108	6	\$1,265	\$1,354	\$1,623
5627	Allegheny Center- Allegheny West	\$1,315	\$74	5	\$1,380	\$1,477	\$1,770
5628	East Carnegie-Oakwood	\$975	\$103	6	\$1,265	\$1,354	\$1,623
5629.01	Hazelwood	\$1,252	\$178	6	\$1,265	\$1,354	\$1,623
5630	Chartiers City-Fairywood- Windgap	\$1,290	\$92	5	\$1,380	\$1,477	\$1,770
5631	Ridgemont-Westwood	\$996	\$128	6	\$1,265	\$1,354	\$1,623
5632.01	North Shore	\$2,107	\$364	1	\$1,840	\$1,970	\$2,360
5632.02	East Allegheny	\$778	\$172	6	\$1,265	\$1,354	\$1,623
5651	Central Northside	\$1,150	\$78	6	\$1,265	\$1,354	\$1,623
5652	California-Kirkbride- Manchester	\$1,041	\$446	6	\$1,265	\$1,354	\$1,623
5653	Hays-New Homestead	\$943	\$22	6	\$1,265	\$1,354	\$1,623
9800	Lincoln-Lemington-Belmar	-	**	6	\$1,265	\$1,354	\$1,623
9801	Highland Park	-	**	5	\$1,380	\$1,477	\$1,770
9803	Squirrel Hill South	-	**	6	\$1,265	\$1,354	\$1,623
9804	Perry North	-	**	6	\$1,265	\$1,354	\$1,623
9805	Squirrel Hill South	-	**	6	\$1,265	\$1,354	\$1,623
9806	Chateau	-	**	6	\$1,265	\$1,354	\$1,623
9807	South Shore	\$2,287	\$164	1	\$1,840	\$1,970	\$2,360
9808	South Oakland	-	**	6	\$1,265	\$1,354	\$1,623
9809	Marshall-Shadeland	-	**	6	\$1,265	\$1,354	\$1,623
9810	Central Lawrenceville	-	**	5	\$1,380	\$1,477	\$1,770

9811	Point Breeze	-	**	6	\$1,265	\$1,354	\$1,623
9812	North Shore	-	**	6	\$1,265	\$1,354	\$1,623
9818	Lincoln-Lemington-Belmar	-	**	5	\$1,380	\$1,477	\$1,770
9822	North Oakland	-	**	6	\$1,265	\$1,354	\$1,623

Notes: All-bedroom Median Gross Rents were derived from the most recent American Community Survey 5-Year Estimates. Payment standards highlighted in green exceeded the corresponding MGR for its corresponding tract, those highlighted in red fell below the MGR, and those highlighted in grey lacked sufficient data. This applies to the following table as well.

Appendix B

Low-Income Housing Tax Credit (LIHTC) Projects Awarded in the City of Pittsburgh Since 2010										
Project	Neighborhood	Year Allocated	Allocation Amount	# Units	# Low-Income Units	Income Ceiling	Nonprofit Sponsor	Targeted Pop.	Project Type	Qualified Census Tract
Eva P Mitchell Residence	Lincoln-Lemington-Belmar	2009	\$159,018	79	79	60% AMGI	No	Seniors	n/a	No
Garfield Heights Phase II	Garfield	2008	\$604,919	45	35	60% AMGI	No	Seniors, Unhoused	New Construction	No
North Hills Highlands	Perry South	2008	\$922,510	60	n/a	60% AMGI	No	Families, Disabilities, Unhoused	New Construction	No
South Hills Retirement	Mount Washington	2008	\$1,206,932	106	84	60% AMGI	No	Families, Disabilities, Unhoused	n/a	No
York Commons	Central Lawrenceville	2008	\$1,434,499	102	97	60% AMGI	Yes	Families, Disabilities, Unhoused	n/a	Yes
Dinwiddie Street Housing	Crawford-Roberts	2012	\$167,159	23	23	60% AMGI	No	Seniors, Disabilities, Unhoused	New Construction	Yes
Garfield Heights Phase III	Garfield	2012	\$872,531	40	31	60% AMGI	No	Seniors, Unhoused	New Construction	No
North Hills Highlands II	Perry South	2012	\$581,415	37	37	60% AMGI	No	Families, Disabilities, Unhoused	n/a	No
Dinwiddie Street Housing II	Crawford-Roberts	2013	\$638,892	23	23	60% AMGI	No	Families, Disabilities, Unhoused	New Construction	Yes
Liberty Park Phase II	East Liberty	2013	\$1,084,994	71	52	60% AMGI	No	Families, Disabilities, Unhoused	New Construction	No

Shanahan Apartments	Bluff	2014	\$1,137,168	43	43	60% AMGI	Yes	Seniors, Unhoused	Acquisition/ Rehab	Yes
Bellefield Dwellings	North Oakland	2015	\$877,391	158	155	60% AMGI	No	Families, Disabilities, Unhoused	Acquisition/ Rehab	Yes
Dinwiddie Street Housing III	Crawford-Roberts	2015	\$797,450	26	26	60% AMGI	No	Seniors, Disabilities, Unhoused	New Construction	Yes
Homewood Senior Apartments	Homewood South	2015	\$1,082,624	41	41	60% AMGI	No	Families, Disabilities, Unhoused	New Construction	Yes
Addison Terrace Ph I	Terrace Village	2017	\$1,941,155	186	149	60% AMGI	No	Seniors, Unhoused	New Construction	Yes
Doughboy Apts	Lower Lawrenceville	2015	\$85,870	45	9	50% AMGI	No	Seniors, Disabilities, Unhoused	New Construction	Yes
East Liberty Place South	East Liberty	2016	\$788,396	52	39	60% AMGI	Yes	Seniors, Disabilities, Unhoused	New Construction	Yes
William Moorhead Tower	North Oakland	2016	\$1,245,896	141	136	60% AMGI	No	Families, Unhoused	Acquisition/ Rehab	Yes
Uptown Lofts On Fifth	West Oakland	2016	\$1,197,437	47	47	60% AMGI	Yes	Seniors, Disabilities	New Construction	Yes
Larimer Phase I	Larimer/East Liberty	2017	\$1,141,699	40	40	60% AMGI	No	Seniors, Unhoused	New Construction	Yes
Penn Mathilda Apts	Bloomfield	2018	\$850,094	39	39	60% AMGI	Yes	Seniors, Disabilities, Unhoused, Veterans	New Construction	No
Brew House Artist Housing	South Side Flats	2019	\$1,281,957	76	48	60% AMGI	No	Seniors, Disabilities, Unhoused	Acquisition/ Rehab	No
Larimer East Liberty Ph I	Larimer/East Liberty	2018	\$1,063,537	81	56	60% AMGI	No	Seniors, Disabilities, Unhoused	New Construction	Yes
Perrysville Plaza	Perry South	2019	\$297,155	101	94	60% AMGI	No	Families, Unhoused	Acquisition/ Rehab	Yes

Addison Terrace Phase II	Terrace Village	2020	\$774,108	90	64	60% AMGI	No	Seniors, Unhoused	New Construction	Yes
Dinwiddie Street Phase IV	Crawford-Roberts	2019	\$659,925	23	23	60% AMGI	No	Seniors, Disabilities, Unhoused	New Construction	Yes
Garfield Glen Phase II	Garfield	2020	\$404,832	19	19	60% AMGI	No	Seniors, Disabilities, Unhoused	New Construction	No
Hillcrest Senior Residences	Carrick	2019	\$1,021,593	66	56	60% AMGI	Yes	Families, Disabilities, Unhoused	New Construction	No
Susquehanna Homes	Homewood South	2020	\$1,082,494	36	36	60% AMGI	No	Seniors, Disabilities, Unhoused	New Construction	Yes
Allegheny Dwellings Ph I	Fineview	2021	\$547,205	65	47	60% AMGI	No	Seniors, Disabilities, Unhoused	New Construction	Yes
Morningside Crossing	Morningside	2021	\$1,196,630	46	39	60% AMGI	No	Families, Disabilities, Unhoused	New Construction	No
Oakland Affordable Living	West Oakland	2020	\$1,169,969	49	49	60% AMGI	Yes	Seniors, Disabilities, Unhoused	New Construction	Yes
Crawford Square Apartments	Crawford-Roberts	2022	\$1,018,336	347	194	60% AMGI	No	Seniors, Disabilities, Unhoused	Acquisition/ Rehab	Yes
Larimer/East Liberty Phase II	Larimer/East Liberty	2021	\$1,022,651	150	108	60% AMGI	No	Seniors, Unhoused	New Construction	Yes
Northside Residences I	Central Northside	2022	\$700,510	75	75	60% AMGI	No	Seniors, Disabilities, Unhoused	Acquisition/ Rehab	No
Squirrel Hill Gateway Lofts	Squirrel Hill South	2022	\$1,110,318	33	33	60% AMGI	Yes	Seniors, Disabilities, Unhoused	New Construction	No
Carson Towers Apts	South Side Flats	2019	\$606,640	133	133	60% AMGI	No	Families, Disabilities, Unhoused	Acquisition/ Rehab	No

Miller Street Apartments	Crawford-Roberts	2021	\$60,000	36	36	60% AMGI	No	Seniors, Disabilities, Unhoused	New Construction	Yes
Mellons Orchard	East Liberty	2022	\$1,031,720	47	37	60% AMGI	No	Seniors, Disabilities, Unhoused	New Construction	No
Larimer CNI Phase IV	Larimer	2023	\$924,894	42	0	60% AMGI	No	Seniors, Disabilities, Unhoused	New Construction	Yes

