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Historic Preservation and Affordable Housing in Rhode Island: A Policy Analysis

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Historic Preservation and Affordable Housing in Rhode Island: A Policy Analysis

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Executive Summary

In recent years there has been a particular interest in using historic preservation to provide low- to moderate-income housing. There are many separate policies and incentives for both historic preservation and affordable housing development in Rhode Island. This policy analysis identifies the policy network already in place in Rhode Island including government agencies, advocacy organizations, and private sector housing developers. The paper explains how existing policies including state planning provisions, tax credits, and housing bonds are providing support for historic preservation and affordable housing. However, the main reason these existing policies are lacking is because there is no program that deliberately consolidates the goals of historic preservation and affordable housing and provides a streamlined process for housing development. The policy analysis identifies tax credits, grant programs, and projects from around the country that demonstrate best practices for possible programs in Rhode Island. The policy analysis synthesizes the best qualities from each of the countrywide examples to make the following recommendations:

- A state historic tax credit increase for affordable housing
- The creation of a community or statewide board that provides funding for historic preservation and affordable housing as interrelated issues
- A credit for rehabilitating older (not necessarily historically significant) existing buildings for affordable housing
- Low Income Housing Tax Credit (LIHTC) priority for historic properties
- Neighborhood-specific strategies for preserving historic integrity while stabilizing rent to prevent displacement of existing residents.

1. Introduction

Over the years the Historic Preservation movement has shifted from a limited scope of restoring house museums to becoming part of public policy to satisfy greater social needs. In recent years there has been a particular interest in using historic preservation to provide low- to moderate-income housing. There are many separate policies and incentives for both historic preservation and affordable housing development. However, it is not always clear how these policies can work together to maximize the economic and social benefits they provide. The existing incentives for both kinds of projects tend to have differing requirements, review processes, and timelines that make combining the credits difficult. Additionally, there is room to create new policies and/or modify existing policies to maximize the benefits of historic preservation and affordable housing.

There are two ways of defining affordable housing. The first definition is housing that is inherently reasonably priced for its size, location, and other features. This definition is colloquial and subjective according to what an individual considers to be affordable. A more objective definition of affordable housing is that “30% or less of annual household income is spent on housing and utilities.”¹ This applies to homeowners with “less than 120% of area median income” and renters with “80% of area median income, adjusted for family size.”² For example, if one’s annual income is \$50,000, one shouldn’t spend more than \$15,000 annually or \$1,250 per month on housing expenses. The development of long-term affordable housing involves government subsidies to keep housing costs at an affordable level.

¹ HousingWorks Rhode Island, *2013 Housing Fact Book*, report (Providence: HousingWorks RI, 2013), pg. 4.

² Rhode Island Department of Administration Division of Planning, *Land Use 2025: Rhode Island State Land Use Policies and Plan*, report no. 109 (2006), pg. 8.

Another important term to define when discussing affordable housing is “housing cost burden.” This term applies to individuals who are spending more than 30% of their income on housing expenses including rent, mortgage payments, and utilities. To be “severely housing cost burdened” is to spend more than 50% of ones income on housing expenses. When individuals and families are spending such a significant portion of their income on housing, it makes it difficult to afford other expenses such as food, health insurance, and education, thus perpetuating the cycle of poverty.³

This policy analysis takes a look at existing policies for historic preservation and affordable housing in Rhode Island. The report also analyzes best practices for policies in other states. Ultimately the policy analysis makes recommendations for new policies and modifications to existing policies that can be made in Rhode Island to take better advantage of the benefits that come from the development of affordable housing in historic buildings.

³ HousingWorks Rhode Island, *2013 Housing Fact Book*, pg. 4.

2. Need for Affordable Housing in America

There has been an increased demand for affordable housing in America. A study from 1999 has shown that 3.7 million working families are spending 50% or more of their incomes on housing.⁴ This means that a significant portion of the population is severely housing cost burdened, according to the previous definition.

The shortage of affordable housing has spurred other negative results. For example, many businesses have a difficult time hiring and retaining employees if there is no affordable housing in the area. A national survey of 300 companies conducted by the Urban Land Institute found that 55% percent of employers have trouble retaining employees due to a lack of affordable housing nearby and long commutes. The same study found that over half of the 1,200 workers surveyed “indicated that they would consider moving closer to work if they could find more affordable housing near their workplace.”⁵ It is especially hard for employers to fill low- to moderate-income positions in areas that lack adequate affordable housing. To make matters worse, many of these low- to moderate-income positions are necessary to communities such as nurses, janitors, firefighters, and teachers.

Affordable housing allows people to achieve financial stability and focus on other matters such as healthcare and education. Reduced housing costs allow people to break out of the poverty cycle and move up the ladder, eventually earning more money. A study was conducted in New Jersey that analyzed income and employment levels of families living in affordable housing. The study showed that income rose by 25% and employment rose by 22% since the families moved into the affordable units. Additionally, federal assistance was reduced by 67% to

⁴ Donovan D. Rypkema, *Historic Preservation and Affordable Housing: The Missed Connection*, report (National Trust for Historic Preservation, 2002), 1.

⁵ HousingWorks, 8.

the families in affordable housing in same study.⁶ This means that families living in affordable housing are less likely to rely on other forms of government aide.

⁶ HousingWorks, 9.

3. Need for Affordable Housing in Rhode Island

The shortage of affordable housing is a statewide issue in Rhode Island. Over one-third of Rhode Island homeowners are housing cost burdened and 15% are severely housing cost burdened. Almost half of 70,000 renter households in Rhode Island are housing cost burdened and more than one quarter are severely housing cost burdened. It can be a choice to be housing cost burdened for the wealthy, but 90% of people who are housing cost burdened earn below \$38,200.⁷

Data regarding the typical living costs and wages in Rhode Island indicate why there is such a demand for affordable housing in the state. The median home price in Rhode Island is \$190,000, with a monthly mortgage payment assumed to be \$1,434. The annual income needed to afford this is \$57,353. Furthermore, the average two-bedroom rent in the state is \$1,176 per month. The income needed to afford this is \$47,040. In comparison, the average private sector wage in Rhode Island is only \$47,632, barely enough to afford the average rent and well below the income needed to afford the median home price. To make matters worse, the median renter household income in Rhode Island is only \$30,196. These numbers illustrate the struggle that families with low to moderate income face in order to find adequate housing.

Housing costs have increased dramatically in recent years, while income levels have not. For example, the average two-bedroom apartment rent in Rhode Island has increased 36% in 10 years.⁸ Additionally, housing prices have more than doubled in the last five years, while household incomes have only increased by 11 percent. If income levels do not rise at the same rate as housing costs, the demand for affordable housing will continue to steadily increase. In

⁷ Ibid, 5.

⁸ Ibid, 12.

2000, Rhode Island was ranked number nine in the country for the percentage of households (12.5 percent) paying more than 50 percent of their income on housing costs.

Additionally, Rhode Island has been slow to develop housing to meet these demands. The state needs 13,081 more affordable housing units in the next 5 years, which is four times as many units as can be produced with existing resources. The number 13,081 is based on the current 10% affordable housing goal for each city and town in the state.⁹ The gap between the need for affordable housing and the number of new affordable units being developed will continue to widen without government intervention and incentives for developers. Compared to all other fifty states, Rhode Island ranks last in housing production, and current production levels cannot keep pace with project job growth. Additionally, the limited development of affordable units that has been taking place has not been equally distributed across the state. Most of the units have been focused in urban areas in recent years. Only six communities out of Rhode Island's thirty-nine cities and towns meet the state's goal of 10% affordable housing.¹⁰

⁹ Rhode Island Department of Administration Division of Planning, *Land Use 2025: Rhode Island State Land Use*, 3.

¹⁰ *Land Use 2025*, 14.

4. Policy Network in Rhode Island

4.1 Government Agencies

The Rhode Island General Assembly has a vested interest in policies relating to affordable housing and historic preservation. It is the duty of Rhode Island legislators to be educated on the issues and deficiencies of the current policies and keep in mind what is in the best interest of state residents. Likewise, municipal governments have the same responsibility towards their residents. Legislation for affordable housing and historic preservation can happen at both statewide and local levels.

The Housing Resources Commission (HRC) was created within the Rhode Island State Division of Planning. The HRC, established in 1998 under the RI Housing Resources Act, is comprised of twenty-seven members representing various constituents in the area of affordable housing. The Commission's objective is to amend and create policies, programs, and standards for affordable housing.¹¹

The Rhode Island Historic Preservation and Heritage Commission (RIHPHC) acts as the State Historic Preservation Office (SHPO). The SHPO is responsible for managing the State Register of Historic Places by surveying and documenting potential historic properties throughout the state. The SHPO is also responsible for creating programs that advocate for the preservation of historic structures and educate the public. Furthermore, the SHPO conducts Section 106 review for federal undertakings that have a potential impact on historic resources. Finally, the SHPO is responsible for running the Federal Historic Rehabilitation Tax credit in partnership with the National Park Service and the Rhode Island State Historic Preservation

¹¹ State of Rhode Island, "State of Rhode Island: Division of Planning," Housing Resources Commission, accessed May 18, 2014, <http://www.planning.ri.gov/community/housingresources/>.

Investment Tax Credit. This involves the architectural review of all proposed tax credit projects.¹²

Commerce Rhode Island, formerly known as the Rhode Island Economic Development Corporation (RIEDC), is a for-profit company that focuses on the development and expansion of the Rhode Island state economy. The mission of Commerce RI is “to work with public, private and non-profit partners to create the conditions for businesses in all sectors to thrive and to improve the quality of life for our citizens by promoting the State's long-term economic health and prosperity.”¹³

4.2 Advocacy Organizations

The Rhode Island Foundation, founded in 1916, is the state’s only community foundation. The Foundation works with philanthropic individuals and organizations to make grants to non-profit groups that address community issues. The RI Foundation seeks to fund initiatives that further education, economic development, and health and welfare in the state.¹⁴

Rhode Island Housing was established by the General Assembly in 1973 as the state’s mortgage finance agency. Their mission is to “ensure that all people who live or work in Rhode Island can afford a healthy, attractive home that meets their needs.”¹⁵ RI Housing provides lending programs, grants, and subsidies for housing to those in need, as well as public education and policy support. They do not receive any government funding for their work so, most of their funding comes from interest on loans they provide for the acquisition and development of homes for developers. RI Housing also acts as a manager for several U.S. Department of Housing and

¹² "Rhode Island Historical Preservation & Heritage Commission: ," Rhode Island Historical Preservation & Heritage Commission: , accessed May 1, 2014, <http://www.preservation.ri.gov/>.

¹³ "Mission," Commerce RI, accessed May 1, 2014, <http://www.commerceri.com/about/mission.php>.

¹⁴ "Our History and Mission," RI Foundation, accessed May 1, 2014, <http://www.rifoundation.org/AboutUs/OurHistoryandMission/tabid/198/Default.aspx>.

¹⁵ <http://www.rhodeislandhousing.org/sp.cfm?pageid=416>

Urban Development programs such as the Section 8 program for several communities, the Lead Hazard Mitigation program, foreclosure mitigation, and loan modification.

HousingWorks RI is a coalition that “ identifies best practices, conducts research, and analyzes data” about housing issues in the state in a way that is easily digestible to the public, community leaders, and policymakers. HousingWorks began in 2004 as a campaign to “educate the public and business community about a rapidly emerging economic development problem: the lack of affordable housing options for the state’s workforce.” Each year they produce and distribute a housing factbook that provides housing data for each city and town in Rhode Island. They also release articles, issue briefs, and infographics on a regular basis. HousingWorks is a key player in making policy recommendations for affordable housing legislation and informing education strategies and communications initiatives.¹⁶

Grow Smart RI, established in 1997 as a result of a conference on sustainable economic growth and urban revitalization, is a coalition that is focused on the state’s economic growth and quality of place. Grow Smart has five target areas including revitalization of urban and town centers, affordable housing, expansion of public transportation, agriculture, and stewardship of natural resources. Grow Smart has a broad and flexible mission which encompasses many constituents and stakeholders. This organization provides training, education, and public policy recommendations.¹⁷

Preserve Rhode Island (PRI) is the statewide historic preservation nonprofit for Rhode Island. PRI provides education on preservation and advocates for “community leaders, developers, public officials and property owners to make decisions that favor historic

¹⁶ "About," HousingWorks RI, accessed May 1, 2014, <http://housingworksri.org/about>.

¹⁷ "Who We Are," Grow Smart Rhode Island, accessed May 1, 2014, <http://www.growsmartri.org/about/who-we-are/>.

preservation and land conservation.”¹⁸ PRI is also the steward of five historic properties throughout the state.

The Local Initiatives Support Corporation (LISC) has a Rhode Island chapter that works to “transform distressed neighborhoods into resilient and sustainable communities of choice and opportunity.” Rhode Island LISC supports local community development projects through loans and grants, training and technical assistance, and policy support. Since 1991, Rhode Island LISC has invested more than \$240 million in community development initiatives, leveraging an additional \$920 million from other funding sources. This investment has resulted in more than 7,000 affordable housing units, as well as 1.5 million square feet of retail and community space for educational, recreational, and health purposes.¹⁹

4.3 Private Sector Housing Developers

Another important constituent of the policy network around affordable housing and historic preservation are and for-profit housing developers including private individuals and organizations. Public-private partnerships are often crucial to leveraging funds from various sources to create a successful affordable housing and/or historic preservation project. Private developers are important because they invest their own funds into the creation of affordable housing and the preservation of historic buildings. If they purchase local materials and hire local contractors and skilled workers, then their impact is twofold. Not only do they help to satisfy the need for affordable housing and historic preservation in the state, but they also help to stimulate the government by creating jobs and giving business to local companies. In an economy where affordable housing and historic preservation may not yield as high of a profit margin as other

¹⁸ "About Us," About Us, accessed May 1, 2014, <http://www.preserveri.org/about>.

¹⁹ "About Us," Rhode Island LISC, accessed May 1, 2014, http://www.lisc.org/rhode_island/about_us/overview/index.php.

developments such as new luxury homes, it is essential that the government provide incentives and establish public-private partnerships to stimulate this kind of development.

4.4 Community Development Corporations

Non-profit developers known as Community Development Corporations (CDCs) are organizations that work to develop affordable rental and homeownership opportunities for communities. Often, the work of CDCs is focused on populations with special needs such as the elderly and people with disabilities. CDC projects are aimed at supporting and achieving several goals including: long-term economic development, responsible growth, and community involvement.²⁰

The Housing Network of Rhode Island is a state association of twenty non-profit Community Development Corporations. The Network supports the work of its member CDCs by creating and spreading public awareness and advocating for policies that further housing, economic, and community development needs. The Network has three major programs to support its mission including the Homeownership Connection, the Partnership for Community Development with Roger Williams University, and the Community Housing Land Trust of RI.

The Homeownership Connection provides education and assistance to homebuyers to encourage responsible purchase and financing of homes. The Partnership with Roger Williams University was formed to strengthen the professional skills of the housing industry and attract young professionals to the field. The Partnership offers an Economic and Community Development Certificate program and a concentration in Community Development. The Community Housing Land Trust (CHLT) ensures that there will be a supply of permanently affordable housing for the future by holding properties in trust. The CHLT also runs a revolving

²⁰ "What Are CDCs?," Housing Network of Rhode Island, accessed May 1, 2014, <http://www.housingnetworkri.org/what-are-cdcs/>.

fund for the acquisition of properties to develop affordable housing using a Community Development Block Grant.²¹

²¹"About HN," Housing Network of Rhode Island, accessed May 1, 2014, <http://www.housingnetworkri.org/about-hwri/>.

5. Planning, Affordable Housing, and Historic Preservation

5.1 Historic Preservation and Planning

Traditional historic neighborhoods often exemplify solid planning principles such as proximity to businesses, schools, and transportation. For example, more than forty percent of residents in older and historic neighborhoods live within five miles of their places of work. Less than twenty-five percent of residents in new housing live that close to their places of employment. Furthermore, more than sixty percent of older and historic neighborhoods have an elementary school within one mile, while less than forty percent of newly constructed neighborhoods do.²² Additionally, over 60 percent of homes in older and historic neighborhoods have shopping within one mile, while less than 40 percent of new homes do. Finally, public transportation is available to residents in nearly 60 percent of older and historic neighborhoods, while about 75 percent of new housing doesn't have any public transportation available nearby.²³ Proximity to businesses, schools, and public transit cuts down on daily transportation costs, which can make a neighborhood inherently more affordable. Many older and historic neighborhoods are already a good match for affordable housing because of this.

5.2 Rhode Island Statewide Land Use Plan 2025 Addresses Affordable Housing and Historic Preservation

The Rhode Island Statewide Land Use Plan for 2025 actively takes a new planning approach, referred to as an “interconnected State and municipal planning system.” As a result of this new approach 29 Rhode Island communities have adopted municipal affordable housing plans that complement the goals of the statewide plan. The central focus of the Plan is that “our

²² Donovan D. Rypkema, *Historic Preservation and Affordable Housing: The Missed Connection*, 7.

²³ Rypkema, 8.

current rate of land consumption is a major departure from our historic pattern of dense urban centers, and is not sustainable in the long and short term.”²⁴ The plan looks to address the dangers of suburban sprawl and how it affects historic preservation and the development of affordable housing. The Plan has 25 objectives and over 90 strategies, but the main priorities include “[d]evelopment concentrated in well-designed centers, neighborhoods, and special places” and a “diverse and affordable housing stock.”²⁵ Both of these priorities address the common planning goals of affordable housing and historic preservation. Although they don’t specifically use the term “historic preservation,” it can be assumed that that is what the Plan is referring to through “well-designed centers,” “special places,” and “diverse” housing stock.

The Plan discusses the current trend of development in the state and why it is incongruent with affordable housing and historic preservation. The current pattern for development is low-density, large-lot neighborhoods. This mode of development wastes open space and makes the management of services and infrastructure much more expensive. Low-density development requires infrastructure such as power lines and sewers to be spread out and not utilized to their full capacity. Additionally, low-density development encourages automobile dependence rather than walking or the use of public transit.²⁶ Overall, low-density development increases the cost of housing rather than keeping prices affordable. If development continues in this fashion, the demand for affordable housing will continue to increase.

The Plan endeavors to initiate a new trend in planning: high-density development. The Plan encourages land use policies that “focus on initiatives for preserving or enhancing neighborhoods, traditional villages and communities, and promoting mass transit, pedestrian environments, affordable housing, compact development, public infrastructure, and urban

²⁴ *Land Use 2025*, v.

²⁵ *Ibid*, vii.

²⁶ *Ibid*, 1-12.

design.”²⁷ Local governing bodies must take some responsibility in encouraging this planning trend. For example, many local regulations prevent high density development by having large-lot requirements. Municipalities must look at their land use policies and amend them to allow more traditional neighborhood development. This will ensure that land is being used efficiently and housing costs are kept at an affordable level.²⁸

A new initiative, RhodeMap RI, is an effort to rewrite the 2025 plan and is currently ongoing. The goal of this new plan is to provide all Rhode Islanders with a chance to give their input. This initiative is being funded by the U.S. Department of Housing and Urban Development Sustainable Communities Initiative Grant, which funds regional planning efforts including housing, land use, economic development, transportation, and infrastructure planning.²⁹

5.3 Rhode Island State Low and Moderate Income Housing Act

The 2004 amendments to the state’s Low and Moderate Income Housing Act incorporate affordable housing into overall planning initiatives and address why there is a shortage of affordable housing. The act requires 10% of housing in communities to be subsidized as low and moderate income housing and encourages changes to local zoning that allows high-density development and mixed-uses. Additionally, the act encourages development of affordable housing in “growth centers” of communities.³⁰ As a result of the legislation passed in 2004, 29 Rhode Island communities created affordable housing plans. Twenty-five of these plans identified centers for development.³¹

²⁷Ibid, 2-4.

²⁸ Ibid, 3-8.

²⁹ "RhodeMap RI," RhodeMap RI, accessed May 1, 2014, <http://rhodemapri.org/>.

³⁰ Ibid, 3-11.

³¹ Ibid, 4-32.

Before the state could make amendments to the Low and Moderate Income Housing Act, the general assembly passed the “Comprehensive Housing Production and Rehabilitation Act of 2004.” This law required that the Rhode Island Housing Resources Commission develop a strategic plan for housing that “quantifies housing needs, identifies implementation strategies to address these needs, and provides guidelines for higher density residential development.” The plan was developed through monthly meetings with various housing interest groups and became Element 423 of State Guide Plan.³²

³² Division of Planning, Rhode Island Department of Administration, *Rhode Island Five Year Strategic Housing Plan: 2006-2010*, report no. 110 (Providence: R.I. Division of Planning, 2006), xiii.

6. The Economics of Affordable Housing and Historic Preservation

The development of affordable housing can stimulate the economy in multiple ways. First of all, an immediate effect of the actual development of housing is that it creates construction jobs in the area. An effect that is somewhat longer lasting is the effect on the residents of the affordable units. Affordable housing allows residents to spend less on housing costs and have more discretionary income that can be used for other expenditures, enabling them to contribute more to the local economy. Overall, housing cost burdened renters in Rhode Island spend \$737 million on rent and utilities per year.³³ If Rhode Island had the adequate amount of affordable housing (10% in each community) these cost burdened renters would save nearly \$400 million. They would be able to spend this money in other ways and contribute to the local economy.³⁴

A large percentage of homes that are inherently affordable without government funding are older or historic. Many people rely on America's historic housing stock for affordable places to live. However, these places are in constant danger of demolition and redevelopment. The following data from a study by economist Donovan Rypkema is indicative of the ability for historic homes to provide affordable places to live:

- “32 percent of households below the poverty line live in older and historic homes.
- 31 percent of homeowners whose household income is less than \$20,000 per year live in older and historic homes.
- 34 percent of renters whose household income is less than \$20,000 per year live in older and historic homes.
- 31 percent of black homeowners and 24 percent of Hispanic homeowners live in older and historic homes.
- 29 percent of elderly homeowners live in older and historic homes.
- 53 percent of all owner occupied older and historic homes have monthly housing costs less than \$500.

³³ HousingWorks, 7.

³⁴ Ibid, 6.

- 48 percent of tenant occupied older and historic homes rent for less \$500 per month.³⁵

Additionally, there is an anecdotal claim that older and historic homes are usually in poor condition and require a lot of work. According to Rypkema's study, only three percent of occupied housing built before 1950 is identified as having "severe physical problems" and eight percent as having "moderate physical problems." This leaves 89 percent of pre-1950 housing in "adequate" condition. A study sponsored by the U.S. Department of Housing and Urban Development estimated that the cost to repair an older home with "severe physical problems" is \$75,000 and the cost to repair an older home with "moderate physical problems" is \$25,000. Only 11 percent of older homes suffer from moderate to severe problems, and the \$75,000 estimate for repairs is "comparable to the most cost effective of Federal housing programs and significantly cheaper than some programs."³⁶ These numbers can certainly vary based on the size of the house and the physical problems. However, where quality is concerned, making repairs to older and historic homes often results in higher quality spaces than new construction for the same amount of investment.

³⁵ Rypkema, 5

³⁶ Ibid, 10

7. Federal and Nationwide Policies that Support Affordable Housing and Historic Preservation

The federal government has two main policies that encourage affordable housing and historic preservation: the Low-Incoming Housing Tax Credit and the Historic Rehabilitation Tax Credit. If one combines both tax credits in the same project, one can maximize the amount of government funding available while also creating the optimal public benefit. Finding ways to “reconcile historic preservation goals with the special economic and social needs associated with affordable housing is critical in addressing one of the nation’s most pressing challenges,” that challenge being the shortage of affordable housing country-wide.³⁷ Furthermore, the rehabilitation of historic structures for affordable housing often involves Section 106 review for compliance with the Secretary of the Interior’s Standards by the federal government and state historic preservation office. There are specific principles that guide the review of affordable housing projects apart from regular rehabilitations. These guiding principles look at preservation from a more pragmatic point of view to keep costs down while also retaining historic integrity.³⁸

The Advisory Council on Historic Preservation (ACHP) is a federal organization that provides recommendations for historic preservation and can play an advisory role in Section 106 review. The ACHP published a list of implementation principles for rehabilitating historic structures for affordable housing. The principles are as follows:

- “Rehabilitating historic properties to provide affordable housing is a sound historic preservation strategy.”
- “Federal agencies and State and local government entities assuming HUD’s environmental review requirements are responsible for ensuring compliance with Section 106.”
- “Review of effects in historic districts should focus on exterior features”
- “Consultation should consider the overall preservation goals of the community.”

³⁷ Advisory Council on Historic Preservation and U.S. Department of Housing and Urban Development, *Affordable Housing and Historic Preservation* (Washington, DC), 3.

³⁸ Advisory Council on Historic Preservation, *Affordable Housing and Historic Preservation*, 4.

- “Plans and specifications should adhere to the Secretary’s Standards when possible and practical.”
- “Section 106 consultation should emphasize consensus building.”
- “The ACHP encourages streamlining the Section 106 process to respond to local conditions.”
- “The need for archeological investigations should be avoided.”³⁹

These implementation principles emphasize the importance of balancing practicality with preserving historic integrity. They suggest that the Section 106 process should be streamlined, more attention should be paid to the exterior versus the interior, and site-specific or community-specific conditions must be considered in the process.

³⁹ ACHP, 6.

8. Policies that Support Historic Preservation and Affordable Housing in Rhode Island

8.1 Rhode Island State Historic Preservation Tax Credit

The state of Rhode Island also has several policies that encourage historic preservation and the development of affordable housing. Like many other states, Rhode Island has a statewide historic rehabilitation tax incentive. In the first incarnation of the tax credit program, there were 277 projects scattered across 23 communities. At the time of a 2007 study, the tax credit program had spurred \$535.25 million in investment for 150 projects over five years, with another \$998.63 million pending in 127 projects. About three-quarters of the projects incorporated rental housing, a total of 6,739 units. 761 of these apartments were subsidized affordable units.⁴⁰ Even more units were planned for “market rate workforce housing.” According to the 2007 study, the “rehabilitation of historic structures is...shown as a significant source of affordable residential housing units for the State, which continues to suffer an affordable housing shortage.”⁴¹

Although the first incarnation of the program was extremely successful, it was repealed in 2008 due to the state’s budget crisis. Rhode Island law-makers claimed that the program was too unpredictable from a financial perspective because there was no cap on the amount of credits each project could receive and the amount of projects that could qualify each year.⁴² The program was revived in 2013 using \$34.5 million in unclaimed tax credits from failed or

⁴⁰ Lipman Frizzell & Mitchell, LLC, *Rhode Island Historic Preservation Investment Tax Credit Economic & Fiscal Impact Analysis*, report (Providence: Grow Smart Rhode Island, 2007), pg. 1.

⁴¹ Lipman Frizzell & Michell, *Rhode Island Historic Preservation Investment Tax Credit Economic & Fiscal Impact Analysis*, 7.

⁴² "Using Historic Preservation Tax Credits to Revitalize Urban Communities in Rhode Island," Smart Growth America, accessed May 1, 2014, <http://www.smartgrowthamerica.org/2012/01/12/using-historic-preservation-tax-credits-to-revitalize-urban-communities-in-rhode-island-2/>.

unfinished projects that were part of the first incarnation of the program. Although the historic rehabilitation tax credit may be intended for historic preservation activities, it has positive effects on other sectors such as affordable housing.

8.2 Building Homes Rhode Island

Another statewide policy was Building Homes Rhode Island (BHRI), a \$50 million housing bond that was established by the state's Housing Resources Commission (HRC) and approved in 2006. The bond, disbursed over four years, funded the development of about 1,300 affordable housing units in 30 cities and towns in RI. Eighty percent of the bond was used for the development of rental apartments. Furthermore, more than half the funding was used for rehabilitating abandoned or foreclosed properties, many of which are historic. In 2012, question 7 on the ballot was approved by voters to create another bond, this time a \$25 million bond to be disbursed over 2 years.⁴³ So far for its fifth year, BHRI has allocated \$11,539,052 to support the development of 362 rental units and eight homeownership opportunities in twelve cities and towns. The remaining funds will be awarded in the spring of 2014.⁴⁴

8.3 Rhode Island State Land Use Plan 2025- Five Year Strategic Housing Plan

The Rhode Island State Land Use Plan for 2025 recognizes that there have been certain trends towards developing historic structures for affordable housing. The Plan attributes these trends to the government incentives mentioned earlier. Specifically, there has been a trend toward adapting mill building into housing because they "typically offer large amounts of floor area, multiple stories and central locations. Mills seem ideally suited for affordable housing and should also be considered for commercial, light industrial, or mixed use (e.g., artists' lofts with

⁴³ HousingWorks, 56.

⁴⁴ "The Housing Bond: Year Five Status Report," HousingWorks RI, December 2013, <http://www.housingworksri.org/sites/default/files/HWRI-BHRIDecember13Update.pdf>.

gallery and studio space).”⁴⁵ Many mill buildings have been converted into luxury lofts also. However, there is not a great demand for luxury apartments in the state, so these buildings are perhaps better utilized as affordable and market-rate housing to “meet the broader needs of the community.”⁴⁶

Although there are incentives for historic preservation and affordable housing funding “remains a patchwork at best, with...a far greater need than supply.” According to the Plan, the government incentives for preservation “have been the single most effective means of restoring our historic buildings.” However, this is not nearly enough to carry on the progress that has been made. The Five Year Strategic Housing Plan states that Rhode Island must create more housing, 5,000 more affordable units specifically. This goal comes from the state’s desire for all 39 cities and towns to meet the 10% affordable housing commitment. In order to achieve this 5,000 unit goal, more incentives that combine affordable housing and historic preservation must be created to encourage development “in higher densities to preserve the state’s unique features of compact settlement patterns surrounded by farmland and forests.”⁴⁷

⁴⁵ *Land Use 2025*, 3-9.

⁴⁶ *Land Use 2025*, 3-15.

⁴⁷ Division of Planning, *Rhode Island Five Year Strategic Housing Plan: 2006-2010*, 1.

9. Best Practices

The rehabilitation of historic buildings and the development of affordable housing units are activities that can be costly and are facilitated by incentives that encourage these activities. It would be difficult and often not economically feasible to carry out either of these activities on their own without incentives. Therefore, it is even more difficult to carry out both in the same project without incentives that are specifically designed to address and encourage both activities. Historic preservation and affordable housing programs and incentives often have differing requirements, standards, goals, and timelines that make combining incentives cumbersome. The following are examples of programs and incentives that specifically target the rehabilitation of historic buildings for use as affordable residential units.

9.1 Connecticut Historic Preservation Tax Credit

The State of Connecticut's Historic Preservation Tax Credit mirrors the Federal Historic Rehabilitation Tax Credit program. The tax credit program provides 25% of the total qualified rehabilitation expenditures back in the form of income tax credits. Additionally, the program provides a 5% credit increase to 30% of rehabilitation expenditures if the project incorporates affordable housing. At least "20% of the rental units or 10% of for sale units [must] qualify under CGS Section 839a."⁴⁸ This program explicitly combines historic preservation and affordable housing in one incentive.

9.2 Maine State Historic Rehabilitation Tax Credit

Much like Connecticut, Maine offers a State Historic Rehabilitation Tax Credit of 25% for all projects that qualify for the federal tax credit program. The state program also provides a

⁴⁸ "Historic Preservation Tax Credit," CT Department of Economic and Community Development: Offices of Culture and Tourism, accessed May 1, 2014, <http://www.cultureandtourism.org/cct/cwp/view.asp?a=3933&q=430786>.

5% credit increase for projects that incorporate affordable housing. The project must be declared eligible for this credit increase by the Maine State Housing Authority (MSHA).⁴⁹

9.3 Community Preservation Act of Massachusetts

The Community Preservation Act of Massachusetts (CPA) was passed in September 2000. Under the Act, communities can choose to have a “dedicated funding source for open space, historic preservation and affordable housing.” A small portion of the property taxes in the community go to the CPA fund. Ten percent of the CPA fund must be spent on historic preservation, affordable housing, and open space each. No more than five percent may be spent on administrative costs. The rest of the fund is discretionary as determined by the town officials. Additionally, CPA communities are eligible for CPA grants from the state of Massachusetts.⁵⁰

9.4 Vermont Housing and Conservation Board

The Vermont Housing and Conservation Board (VHCB) was established for the purpose of “creating affordable housing for Vermonters, and conserving and protecting Vermont's agricultural land, forestland, historic properties, important natural areas, and recreational lands.”⁵¹ The VHCB administers the Vermont Housing and Conservation Trust Fund (VHCTF) for the state of Vermont. Funding from the VHCTF is granted or loaned to nonprofit housing organizations for the development of affordable housing.⁵² The VHCB ensures that “investments in one area will not adversely impact another priority.” The agency strategically

⁴⁹ "Tax Incentives," Maine Historic Preservation Commission:, accessed May 1, 2014, http://www.maine.gov/mhpc/tax_incentives/.

⁵⁰ "The New Community Preservation Act Impacts the Landscape," *Perspectives in Landscape Design* 18, no. Spring 2001, 8, accessed October 8, 2013, <http://0-search.ebscohost.com/helin.uri.edu/login.aspx?direct=true&db=a9h&AN=35777418&site=ehost-live>.

⁵¹ "Chapter 15: Vermont Housing and Conservation Trust Fund," The Vermont Statutes Online, accessed May 1, 2014, <http://www.leg.state.vt.us/statutes/fullchapter.cfm?Title=10&Chapter=015>.

⁵² "Housing Programs | VHCB," Vermont Housing and Conservation Board, accessed May 1, 2014, <http://www.vhcb.org/housing.html>.

funds affordable housing developments located in city and town centers in existing buildings to promote walkability and income diversity. This kind of focused development allows for the rehabilitation and reuse of historic buildings and the preservation of open space through cluster development.⁵³

9.5 Michigan Housing Development Authority

The state of Michigan is unique in the fact that their State Historic Preservation Office is a department of the state's Housing Development Authority (MHDA). Historic preservation and affordable housing are linked intrinsically, simply by the structure of the state's government. However, Michigan does not have any policies that explicitly combine preservation and affordable housing.⁵⁴

9.6 Illinois Community Development Assistance Program

The Illinois Department of Commerce and Economic Opportunity (DCEO) is responsible for administering the Community Development Assistance Program (CDAP) with funding from the U.S. Department of Housing and Urban Development. This program funds the rehabilitation of existing housing for use as low-to-moderate income units. The CDAP is a competitive statewide program for communities with fewer than 50,000 residents. The main requirement of the program is that a minimum of 51% of the project must benefit low-to-moderate income individuals. Communities can receive up to \$350,000 per year to update affordable residential

⁵³ "Housing and Conservation Board," Smart Growth, accessed April 25, 2014, http://www.smartgrowth.org/action/pdf/cs_036_HousingConservationBoard_VT.pdf.

⁵⁴ "MSHDA - Michigan State Housing Development Authority," MSHDA - Michigan State Housing Development Authority, accessed May 1, 2014, <http://www.michigan.gov/mshda/0%2C4641%2C7-141-7559-217947--%2C00.html>.

units.⁵⁵ The program doesn't specify an age requirement for the existing building, but historic buildings are definitely candidates for this funding.

9.7 Wisconsin Low Income Housing Tax Credit

Wisconsin has a statewide competitive tax incentive that mirrors the Federal Low Income Housing Tax Credit (LIHTC), providing funding to affordable housing developments. However, Wisconsin's program differs in several major ways concerning historic preservation. During the project review process, preference is given to rehabilitations of historic buildings with fewer than twenty-four residential units. Additionally, preference is given to projects that qualify for both the state and federal historic rehabilitation tax credits. The purpose of this is to raise the standards of design and construction quality above the minimum allowed in the program. Also, the idea is that if affordable housing is located in existing buildings in established neighborhoods, this will "lessen social problems associated with spatial separation."⁵⁶

9.8 Savannah Landmark Rehabilitation Project 1975

The Savannah Landmark Rehabilitation Project (SLRP) was created in response to the displacement of low-income renters in Savannah during the revitalization of the Landmark District in downtown. Between 1965 and 1977 home values in the Landmark District rose by 275%, causing rents to rise dramatically as a result.

However, the Savannah Victorian Historic District located just to the south of the Landmark district remained relatively untouched by the major revitalization, for the time being.

⁵⁵ "North Central Illinois Council of Governments Affordable Housing & Housing Rehabilitation," North Central Illinois Council of Governments Affordable Housing & Housing Rehabilitation, accessed May 1, 2014, <http://www.ncicg.org/content/affordable-housing-housing-rehabilitation.aspx>.

⁵⁶ Malik R. Walkins, Ph.D. and Melissa Jest, MSUS, *Exploring the Contribution of Historic Preservation to the Persistence of Poverty: Developing Affordable Housing in Savannah, Georgia*, Savannah State University, University of Kentucky Center for Poverty Research, pg. 32, accessed April 1, 2014, http://www.ukcpr.org/Publications/Newsletter-Vol5_1_Article5.pdf.

This area was mainly occupied by minorities with low incomes. The houses in the neighborhood were in various states of disrepair but maintained a great amount of historic integrity. Many were fearful that the gentrification of the Landmark district would spread to the Victorian district and displace more residents.

By 1982 the SLRP preserved and rehabilitated 300 affordable units in the district and prevented a great deal of displacement. The residents of the district are still primarily minorities with low-to-moderate income. The SLRP used the Federal Historic Rehabilitation Tax Credit, the LIHTC and other incentives to fund the rehabilitations.⁵⁷

⁵⁷ Malik R. Walkins, Ph.D. and Melissa Jest, MSUS, *Exploring the Contribution of Historic Preservation to the Persistence of Poverty: Developing Affordable Housing in Savannah, Georgia*, 43-45.

10. Preservation at Odds With Affordable Housing?

There is an anecdotal claim that historic preservation always ends in gentrification and inevitably raises housing costs in neighborhoods that used to be affordable. While this may happen in some cases, it is crucial to take measures to prevent it from happening. When a historic neighborhood is being largely rehabilitated, there needs to be a public policy goal to make the neighborhood economically diverse, i.e. mixing affordable units among market-rate and luxury units. Additionally, there must be initiatives such as rent and tax stabilization to keep long-term residents in their homes. Overall, preserving a neighborhood should be a positive experience for both the existing residents and the new residents who are attracted to the neighborhood as a result of the activity.⁵⁸

More flexible standards for preservation must be used specifically for the development of affordable housing. The Community Partners Program of the National Trust for Historic Preservation, in cooperation with state and local preservation groups, has created new design standards for cost-sensitive rehabilitation projects. It is possible that a tiered approach for historic designation may help to determine the level of flexibility a project should be given. Historic buildings classified in a lower tier would have less stringent guidelines for preservation.⁵⁹

Building codes in various states require historic buildings to be brought up to code if the rehabilitation costs are a certain amount compared to the value of the property or the rehabilitation activities affect a certain percentage of the building. This often makes it difficult

⁵⁸ Rypkema, 14.

⁵⁹ Walkins and Jest, 31.

and expensive to rehabilitate historic buildings. The cost of the rehabilitation can make it difficult for re-use as affordable housing in which the full potential profit cannot be earned.⁶⁰

It is important to recognize that the main goal of federal and state historic rehabilitation tax credits is historic preservation, not affordable housing. This main goal “increases project costs by requiring certain materials and by causing delays in waiting for state preservation reviews.”⁶¹ A 2001 report by the U.S. Department of Housing and Urban Development found that “because the Secretary of Interior’s rehabilitation standards have cost implications, smaller projects with lower economy of scales are more likely to suffer in quality or to be abandoned.”⁶² Preservation standards and requirements must be scaled back to increase cost efficiency and ensure the success of affordable housing developments in historic buildings. Additionally, the review process must be condensed and streamlined for these projects.⁶³

It is important to recognize that historic preservation is not necessarily at odds with affordable housing. If certain policies are established and compromises are made as far as standards and review processes, the two can work successfully together to achieve the maximum economic and social benefits.

⁶⁰ Ibid, 32.

⁶¹ Ibid, 90.

⁶² Ibid, 90.

⁶³ Ibid, 91.

11. Recommendations

Ultimately, Rhode Island needs programs, initiatives, and incentives that specifically address the combination of affordable housing and historic preservation. Both fields have different goals that are not necessarily compatible. On a fundamental level, historic preservation is concerned with conserving the historic fabric of a building, while affordable housing is designed to provide housing for low-to-moderate income individuals and families, often in the most cost-effective way possible. The existing incentives for both kinds of projects tend to have differing requirements, review processes, and timelines that make combining the credits difficult. In order to encourage developers to carry out projects that incorporate historic preservation and affordable housing, the state of Rhode Island must create an incentive that is designed specifically to support these kinds of projects. Combining the credits is no longer enough to encourage this kind of development.

The first option for encouraging the combination of historic preservation and affordable housing in the state is to upgrade the current state historic tax credit by offering a credit increase to projects that incorporate a certain percentage of affordable housing in the building, similar to the programs in Connecticut and Maine. This option would have other benefits such as encouraging income diversity in historic neighborhoods and reducing the isolation of affordable housing developments in communities.

Another option is creating a public trust fund that distributes loans and/or grants for community activities that include historic preservation and affordable housing. This funding could be made available on a local adoption basis as in the CPA or on the state level as in the Vermont Housing and Conservation Board. The only drawback of the CPA is that it promotes historic preservation and affordable housing separately but does not necessarily champion the

combination of the two. The Vermont program funds activities by analyzing affordable housing, historic preservation, and open space conservation issues and how they affect each other throughout the state. For example, the VHCB funds affordable housing developments in existing historic buildings in downtown areas because this activity preserves the architectural fabric of the community, takes advantage of existing infrastructure including public transportation, and preserves open space by utilizing existing buildings and reducing development on virgin land. The state of Rhode Island would benefit by establishing a similar program that addresses these interrelated issues.

Furthermore, the state should consider establishing a program similar to the Illinois Community Development Assistance Program (CDAP), which provides funding for the rehabilitation of existing structures for use as affordable housing units. This program doesn't specifically target historic buildings, but promotes sustainable growth and community preservation in general. A program like this would support the rehabilitation of older structures in Rhode Island that are not officially listed on the National Register of Historic Places. A program like this may streamline the process for rehabilitating older buildings that have a lesser degree of individual historic significance and target buildings that have a greater neighborhood or community value. For example, triple-deckers are an extremely common building typology in Providence, Rhode Island, built between around 1870 and 1920. Most triple-deckers are not listed on the National Register and do not have their own individual historic significance. However, together they make up a large part of the fabric of the city, and it is crucial that they are preserved in the future. A grant program such as this one could prove successful in the preservation of this type of structure.

Additionally, the state may consider granting Low Income Housing Tax Credit priority to historic preservation projects, similar to Wisconsin. This would provide a similar benefit to creating a tax credit increase to the state Historic Tax Credit for affordable housing.

An initiative similar to the Savannah Landmark Rehabilitation Project (SLRP) can possibly be carried out at the local level in towns and cities across Rhode Island. Communities could target well-preserved historic neighborhoods with many low-to-moderate income residents. For example, Providence has several neighborhoods including Elmwood, the West End, and Federal Hill that have high levels of historic integrity. In these neighborhoods, many of the residents have low-to-moderate incomes and cannot afford to maintain their properties. A program that targets specific neighborhoods for rehabilitation with the goal of keeping current residents in place would benefit areas such as these.

12. Conclusion

The social and economic benefits of historic preservation and affordable housing are clear. They both can improve the quality of life of the citizens of Rhode Island by providing a beautiful and affordable environment, rich in culture and history. The state has policies that incentivize historic preservation and affordable housing. These policies seem to work well together, and, in fact, many developers have figured out how to combine the incentives to receive the optimal amount of government funding. However, Rhode Island does not have any policies that specifically and intentionally combine historic preservation and affordable housing. There have already been such strong results throughout the state through the combination of the two activities, but imagine what could be accomplished through new policies and updates to existing policies that intentionally make this connection. Possible policies and action steps for Rhode Island include:

- A state historic tax credit increase for affordable housing
- The creation of a community or statewide board that provides funding for historic preservation and affordable housing as interrelated issues
- A credit for rehabilitating older (not necessarily historically significant) existing buildings for affordable housing
- LIHTC priority for historic properties
- Neighborhood-specific strategies for preserving historic integrity while stabilizing rent to prevent displacement of existing residents.

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