

**CITY OF BALTIMORE  
COUNCIL BILL 10-0234R  
(Resolution)**

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Introduced by: Councilmembers Clarke, D'Adamo, Henry, Cole, Stokes, President Young,  
Councilmembers Kraft, Middleton, Conaway, Holton, Spector, Welch, Reisinger, Curran,  
Branch  
Introduced and adopted: November 22, 2010

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**A COUNCIL RESOLUTION CONCERNING**

**Request for State Action - Low Income Housing Tax Credit Qualified Application Plan**

FOR the purpose of urging the Maryland CDA to refrain from committing to the significant policy change embodied in the proposed Qualified Action Plan Section 4.3.3 *Housing in Communities with Indicators above Statewide or County Averages* at this time, in order to allow for a full and open consideration of how this change would affect the ability of disadvantaged communities to fairly compete for Low Income Housing Tax Credits.

**Recitals**

The Baltimore City Council has long recognized the need for affordable housing in Baltimore City and the invaluable role which the Department of Housing and Community Development's Low Income Housing Tax Credit Program plays in its development. Without LIHTC funding, revitalization in our communities would be most difficult, if not impossible. Ensuring that projects in Baltimore have a fair opportunity to compete on a level playing field for LIHTC funding is therefore essential.

CDA's current *Qualified Application Plan (QAP)* embodies this level playing field in a competitive balance in which all areas of the state have a fair chance to compete for funding. It has come to this Council's attention, however, that CDA has very recently proposed adding to the QAP Section 4.3.3 *Housing in Communities with Indicators above Statewide or County Averages*, which threatens to upset this balance and make it more difficult for projects in the City to compete effectively for funding.

This new section would provide preference points to projects located in areas with higher than average home prices, incomes, or home ownership rates. By definition, disadvantaged neighborhoods most in need of LIHTC funding to finance much needed revitalization projects would be unable to qualify for these preferences. This could seriously endanger their ability to compete for financing and could significantly undermine the City's efforts to rebuild our neediest communities.

Such a change is a serious matter, with broad policy implications, that should be carefully considered. It is critical that all stakeholders have clear notice of the proposed change and receive the opportunity to understand its implications for their communities. Most importantly, they need the time and the opportunity to be heard in a full and open consideration of this issue.

CDA's revision of the QAP has been underway for months, but apparently this new preference has just been proposed in the final few weeks of the revision process. It was not on

EXPLANATION: Underlining indicates matter added by amendment.  
~~Strike out~~ indicates matter deleted by amendment.

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1 the table from the beginning as it should have been. This is an unnecessarily hurried way to deal  
2 with such serious change, and this Council must voice a strong objection to it. There should be a  
3 full, open, and complete debate on this issue before such a fundamental change in how the State  
4 allocates its development dollars is adopted.

5 It is therefore important that CDA not incorporate the addition of Section 4.3.3 *Housing in*  
6 *Communities with Indicators above Statewide or County Averages* into the QAP at this time.  
7 There is plenty of time to have a proper, open process of consideration regarding this issue, and  
8 such a discussion would be welcomed. However, adopting the proposed new preferences in such  
9 an unnecessarily hurried fashion is simply inappropriate.

10 **NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF BALTIMORE,** That the  
11 Maryland CDA is urged to refrain from committing to the significant policy change embodied in  
12 the proposed Qualified Action Plan Section 4.3.3 *Housing in Communities with Indicators above*  
13 *Statewide or County Averages* at this time, in order to allow for a full and open consideration of  
14 how this change would affect the ability of disadvantaged communities to fairly compete for  
15 Low Income Housing Tax Credits.

16 **AND BE IT FURTHER RESOLVED,** That a copy of this Resolution be sent to the Maryland  
17 Secretary of Housing & Community Development, the Assistant Secretary of Development  
18 Finance in the Maryland Department of Housing & Community Development, the Director of  
19 Multifamily Housing Programs for the Maryland Department of Housing & Community  
20 Development, the Director of Housing Development in the Maryland Department of Housing &  
21 Community Development's office of Multifamily Housing Programs, the Mayor, and the  
22 Mayor's Legislative Liaison to the City Council.