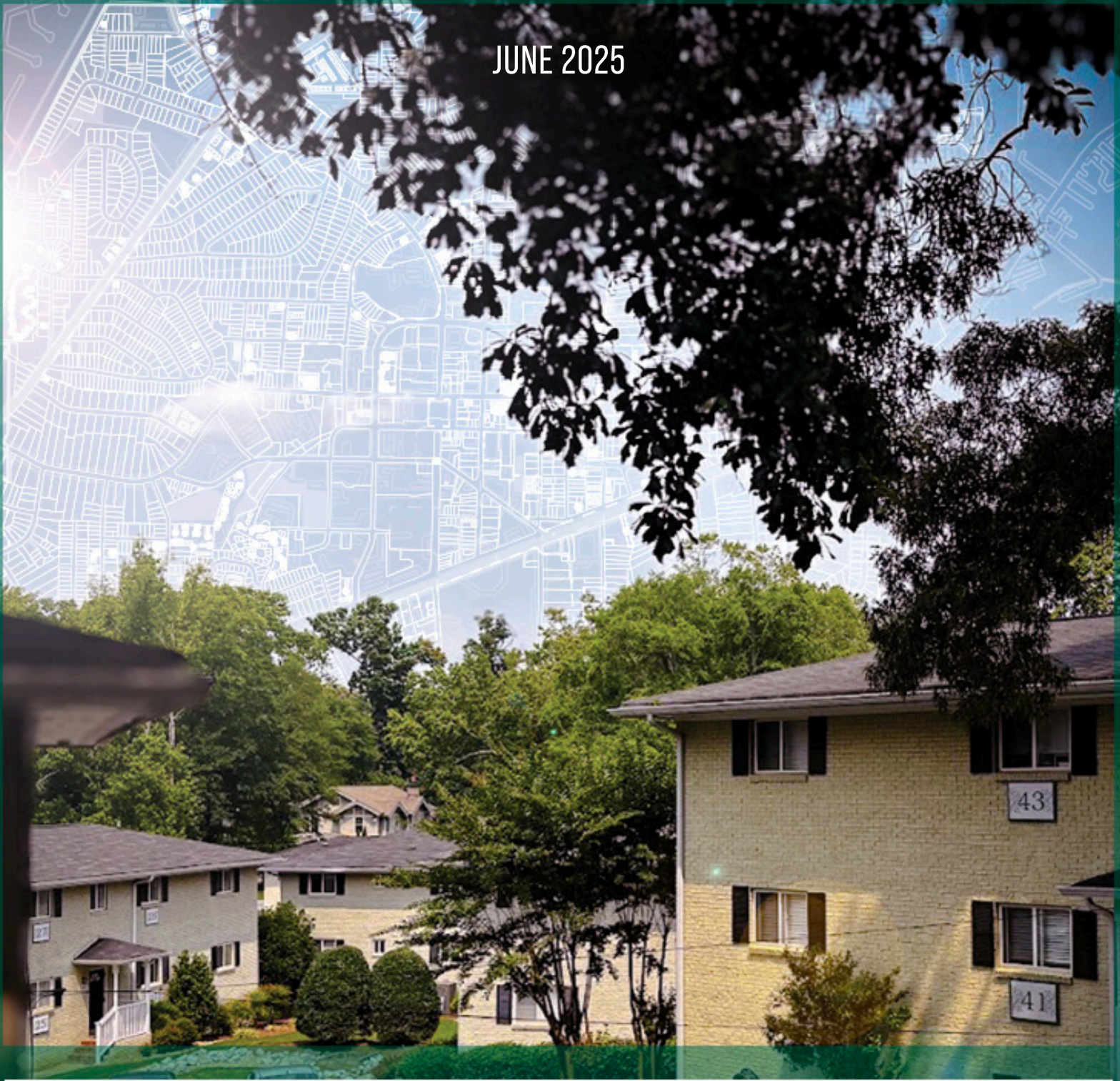


JUNE 2025



PRESERVATION STRATEGIES FOR NATURALLY OCCURRING AFFORDABLE HOUSING

DECATUR, GA



Acknowledgments

PROJECT TEAM

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A GUIDE TO ACRONYMS USED

This document makes frequent use of acronyms that may be unfamiliar to the general reader. Acronyms are defined explicitly when first used, and the most frequently used acronyms are summarized below for reference.

- AMI: Area Median Income
- CCSD: Community Center for South Decatur
- CDBG: Community Development Block Grant
- CHIP: Community HOME Investment Program
- COA: Condominium Owners Association
- DCA: Department of Community Affairs
- DDA: Downtown Development Authority
- HOA: Homeowner Association
- HTC: Historic Tax Credit
- HTF: Housing Trust Fund
- LIHTC: Low-Income Housing Tax Credit
- NOAH: Naturally Occurring Affordable Housing
- PILOT: Payment In Lieu of Taxes
- POA: Property Owners Association
- SHPO: State Historic Preservation Office
- TAD: Tax Allocation District
- TIF: Tax Increment Financing



ABOUT GEORGIA CONSERVANCY

Georgia Conservancy is a non-profit, 501(c)(3) organization founded in 1967. Georgia Conservancy was founded by Georgians, and we work for Georgians across the state. Our mission is simple: healthy lands, thriving communities, and a future where every Georgian can enjoy the outdoors for generations to come.

ABOUT THE PROJECT

The Decatur Naturally Occurring Affordable Housing (NOAH) Preservation Strategies effort was initiated in 2024 through the Community Development Assistance Program of the Atlanta Regional Commission. The project's intent is to research methods to preserve NOAH within the City of Decatur. It is one in a long line of commitments by the City to find ways preserve and create affordable housing units. The following report is intended to provide ideas for actions that will assist housing preservation goals, as well as updating records of existing NOAH units and exploring mechanisms used in states, counties, and municipalities outside of Decatur.



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Introduction to Naturally Occurring Affordable Housing

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NTRODUCTION TO NATURALLY OCCURRING AFFORDABLE HOUSING (NOAH)

Naturally Occurring Affordable Housing (NOAH) is unsubsidized housing that is more affordable relative to market-rate housing. By contrast, subsidized affordable housing receives financial support to lower housing costs for tenants. Unsubsidized affordable housing is sometimes referred to as “naturally occurring” because it is affordable within normal market conditions and without financial assistance.

NOAH is the largest source of affordable housing nationwide, far surpassing the number of subsidized housing units. However, NOAH is at risk from market pressure leading to increases in sale and rental prices and demolitions to convert NOAH properties to more profitable uses.

While NOAH units are at risk of disappearing or “pricing up” in Decatur’s strong seller’s market, the many units that remain are an important wellspring of comparatively affordable housing for the city’s residents.

Introduction to Naturally Occurring Affordable Housing



INTRODUCTION

HOW TO USE THIS DOCUMENT

The following report outlines strategies to address preservation of Naturally Occurring Affordable Housing (NOAH) within the City of Decatur. The report includes an in-depth analysis of Decatur's existing NOAH stock and opportunities specific to the city. However, the report can, and should, be reviewed as a toolkit for any community in Georgia thinking about implementing policies and programs related to NOAH preservation. This is by no means a comprehensive list of possible actions, though it is the hope that those explored here can be useful to help communities address this component of the housing crisis.

WHAT IS NOAH?

NOAH, or Naturally Occurring Affordable Housing, refers to rental and for-sale properties that are affordable without financial subsidies. NOAH units constitute the majority of workforce housing in the United States for low- to moderate-income residents, particularly for households that earn between 80% and 120% of the area median income (AMI). For a two-person household, 80%-120% AMI in the Atlanta-Sandy Springs-Roswell Metropolitan Area is approximately \$68,800- \$103,200. This range typically includes a variety of professions critical to a healthy and functioning community, including teachers, emergency response workers, and nurses. The inherent diversity of NOAH housing stock allows it to meet the needs of

a wide range of households, strengthening the social fabric of communities overall.

NOAH units may be found in older buildings, have limited amenities, and may have smaller footprints (square footage and/or lot size). These characteristics make NOAH units relatively more affordable than other properties. As their name implies, NOAH properties are defined by their cost, not any other characteristic. NOAH units can be of any housing type, such as apartments, duplexes, small multi-family buildings, older townhome complexes, and older small single-family. All of the above could be either renter- or owner-occupied. The preservation of these affordable homes is critical to address the housing crisis that communities like Decatur are facing nationwide.

NOAH properties are not protected, and their status as affordable is at risk when properties are sold, renovated, or redeveloped. Rising prices for any reason (e.g. increased property taxes, increased insurance costs, and market pressure) can have an impact on the affordability of these properties. Because of their diversity and the various conditions that threaten them, NOAH properties will need a strategic, probably multifaceted preservation approach.

INCOME LIMITS (2025) - ATLANTA-SANDY SPRINGS-ROSWELL METROPOLITAN AREA (HUD)

Household Size	1-Person	2-Person	3-Person	4-Person	5-Person	6-Person	7-Person
80% AMI	\$64,000	\$73,120	\$82,240	\$91,360	\$98,720	\$106,000	\$113,360
100% AMI	\$80,000	\$91,400	\$102,800	\$114,200	\$123,400	\$132,500	\$141,700
120% AMI	\$96,000	\$109,680	\$123,360	\$137,040	\$148,080	\$159,000	\$170,040

Income Limits

Income limits are used to determine eligibility for certain types of housing assistance. They are useful here in illustrating household incomes for a range of household sizes and area median income brackets.

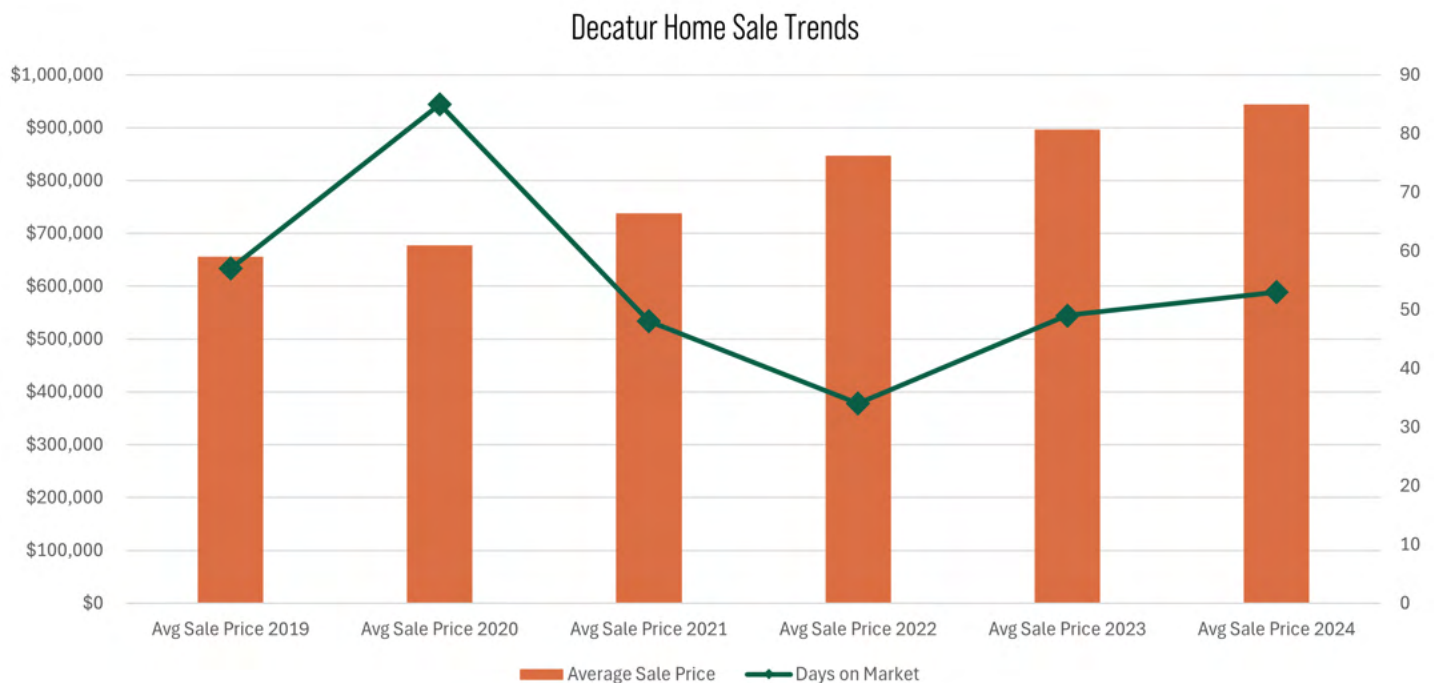
INTRODUCTION

WHO IS NOAH FOR?

NOAH is indistinguishable from other housing except for its lower price point, making NOAH units more attainable for low- to moderate-income households. Anyone can choose to live in NOAH; the units are not income restricted, though income restrictions can be stipulated under certain strategies or agreements intended to keep at-risk NOAH units affordable. For many low- to middle-income households, NOAH units are a financially sustainable housing option. Professionally, many of these households include civil servants, first responders, service employees, students, and other essential workers. These households may earn too much to meet income qualifications for housing assistance programs while at the same time struggling to afford market-rate housing.

WHY IS PRESERVING NOAH IMPORTANT NOW?

Increasing market pressures continue to place affordable properties at risk of being redeveloped, eroding Decatur's existing NOAH stock. At the same time, high housing prices are straining household budgets. Since 2019, average sale prices of homes in the Decatur area have increased by 43.9%, from roughly \$650,000 to over \$900,000. Rising home sale prices accelerate prospective redevelopments and renovations, a key threat to NOAH housing stock. A swift and concerted effort to preserve as much of the NOAH stock as possible is required to stem the loss of Decatur's remaining NOAH units while market pressure to redevelop them is high.



Average Home Sale Prices and Days on Market in Decatur (2019-2024)

Average home sale prices have risen by nearly 44% from 2019 to 2024 according to real estate records. The average home sale price was nearly one million dollars. If prices continue to rise, homeownership in Decatur will be unattainable for many middle-income households. Potential returns on investment to demolish and replace NOAH units will increase as well.

INTRODUCTION

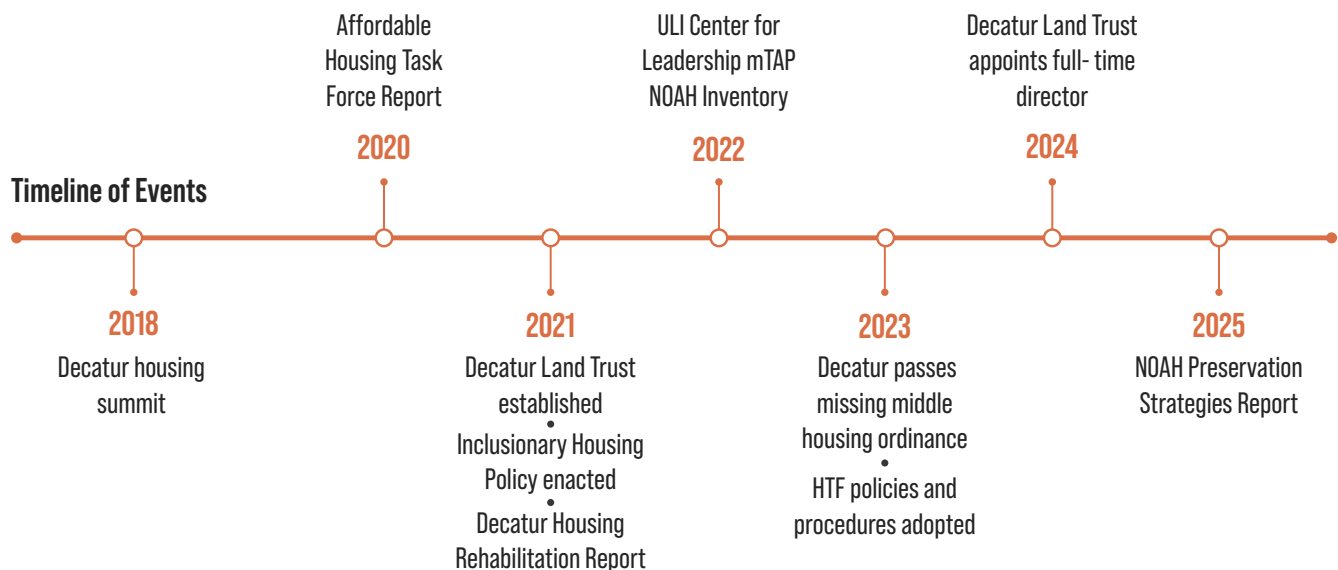
DECATUR'S AFFORDABLE HOUSING TASK FORCE

Decatur has engaged in several efforts to preserve and create affordable housing. The city's Affordable Housing Task Force compiled a report of findings in February 2020 that outlined recommendations for new policies, programs, and initiatives to preserve existing affordable housing and guide the development of new workforce housing. The report highlighted the critical importance of NOAH preservation, both to limit the increase of rental prices and to prevent replacement of NOAH by new, market-rate construction. Key recommendations to maintain and add affordable units in Decatur include strategic partnerships, mandatory inclusionary zoning, tax abatements, amendments to zoning district regulations, innovative living typologies, and strengthening the Decatur Land Trust. Since the conclusion of the Task Force, some of these recommendations have been successfully implemented in Decatur:

- **Inclusionary Zoning:** Adopted in July 2020, the Decatur mandatory inclusionary zoning policy requires new development with more than five units to set aside at least 10% of them for moderate- income households.
- **Unified Development Ordinance:** Adopted in 2021, the Decatur Unified Development Ordinance was modified to allow accessory dwelling units and increase the number of cottage court homes allowed on a lot. These forms of

housing will help increase the variety and density of housing options that match the scale of the existing community.

- **Decatur Land Trust:** The Decatur Land Trust (DLT) was formally incorporated in July 2021 with a mission to provide permanently affordable housing and preserve existing affordable housing within the City of Decatur. Since its inception, the DLT has developed a cottage court style neighborhood with 6 homes, is selling 3 condominiums through an agreement with a developer, and has provided home repairs for seniors.
- **Missing Middle Ordinance:** In 2023, Decatur passed an ordinance to allow duplexes, triplexes, and quadplexes citywide to increase the city's attainable housing.
- **Housing Trust Funds (HTF's):** Decatur established its Housing Trust Fund in 2008 and adopted governing policies and procedures in 2023. The fund can be used for a wide variety of housing-related purposes, including land and property acquisition, rehabilitation, predevelopment services, and any other purpose that "helps address the City's goals and priorities of creating and preserving affordable housing." The HTF is funded primarily by annual appropriations from Decatur's general fund.



NOAH INVENTORY

RENTAL NOAH PROPERTY INVENTORY

In this analysis, NOAH rental units are defined as affordable for 80% Area Median Income (AMI). The table at the bottom of this page shows rental prices that are determined to be affordable to 80% AMI households according to 2024 rent limits.

Rental units that are potential NOAH units were identified by cross-referencing previous lists of NOAH properties and adding additional properties from active and expired rental listings. When referencing previous rental NOAH lists, the current or most recent rental rate for units in the property was researched to confirm that the units still fell within the affordable rent limit. Rental rates were researched using Zillow and other publicly available listing sites, property management websites, and by contacting property managers. If it was not possible to find a rental rate and the property was previously identified on a rental NOAH list, then it was assumed that the property was still a NOAH property. Additionally, a small number of properties were found to have rental rates in one or more units that were slightly above the 80% affordable range. These few properties were also considered to still be NOAH properties; their monthly rental price exceeded the affordable monthly rental price by less than 5%.

The total number of units in the property was determined through information from previous NOAH lists and tax parcel

information. If at least one unit in the property was determined to fall into the affordable rental range, then the whole property was considered a NOAH property and all units in the property were considered potential existing NOAH units. This assumption likely results in some overestimation of the number of NOAH rental units, as rental rates between units of the same number of bedrooms in the same property may be inconsistent, and affordability of units of one size does not always predict affordability of other units in the same property.

Researching active rental listings had minimal efficacy as an attempt to identify additional NOAH properties, as only currently available units for rent are shown. However, this research uncovered some properties that were previously not identified as NOAH. Conversely, some properties on previous NOAH lists appeared to have been demolished or converted (e.g. to single-family homes).

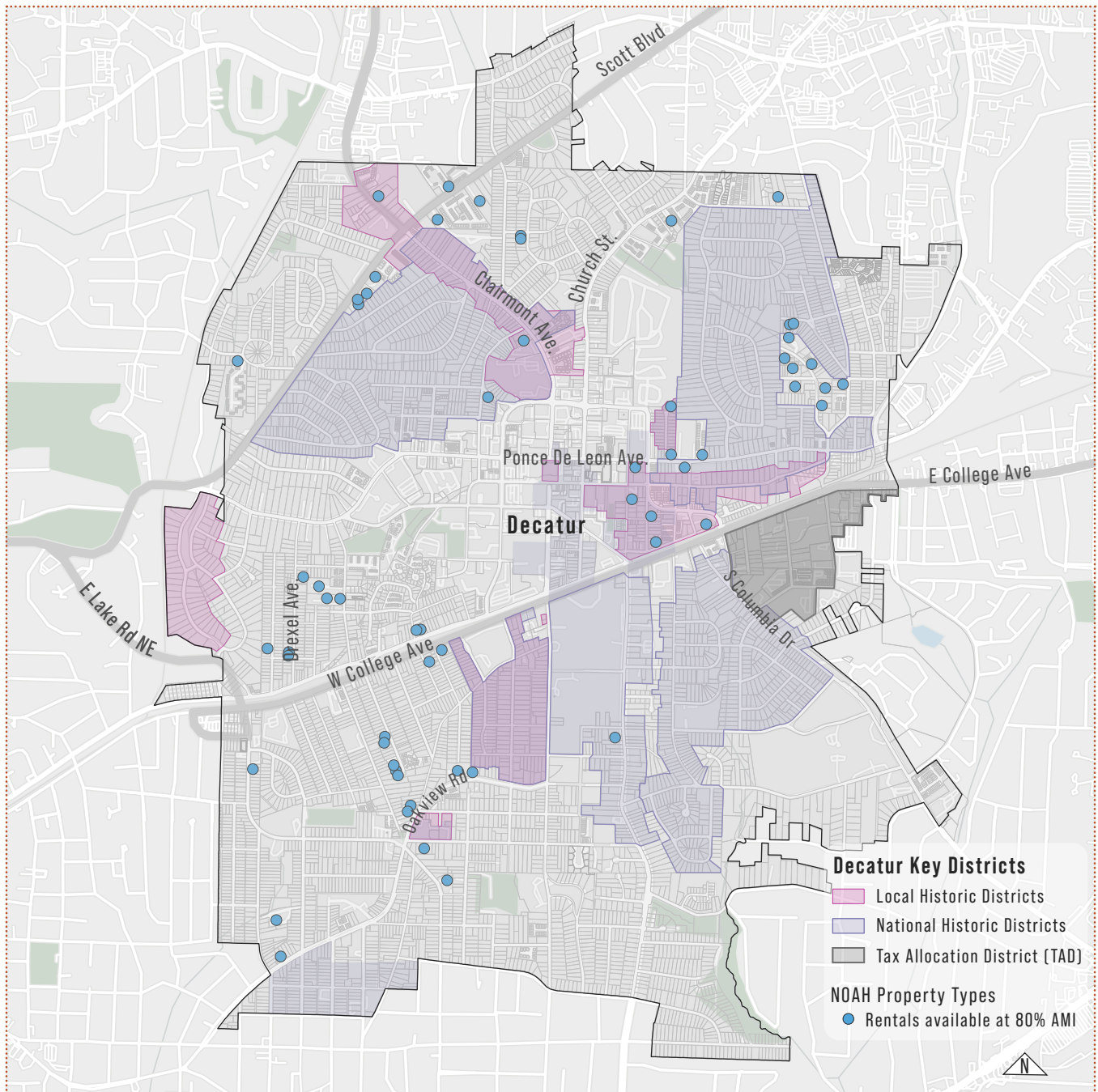
Overall, this methodology located approximately 555 NOAH rental units remaining in Decatur. However, because of the uncertainties stemming from limited availability of thorough and accurate data, this number should be viewed as an estimate, and the properties identified should be considered potential NOAH properties.

MONTHLY RENT LIMITS (2024), ATLANTA-SANDY SPRINGS-ROSWELL METROPOLITAN AREA (HUD)					
Unit Size	Efficiency	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
80% AMI	\$1,506	\$1,613	\$1,936	\$2,236	\$2,494

Rent Limits

These monthly rent prices reflect rates corresponding to unit sizes deemed affordable in 2024. These rents, not including utility allowance, should be roughly a third of the gross income of the household, but the calculation is more complex as unit sizes and household sizes grow. Homes renting at or below affordable rents to 80% AMI households were identified as NOAH. [Source: Invest Atlanta]

NOAH INVENTORY



Potential NOAH Rental Inventory

The rental properties identified as potential NOAH represent a spectrum of housing typologies, from missing middle housing types like duplexes and quadplexes to apartments.

NOAH INVENTORY

FOR-SALE NOAH INVENTORY

For-sale NOAH properties were identified by referencing real estate transaction records from a local listing service. (“For-sale” in the context of the inventory refers to owner-occupied or fee simple properties and not homes that are selling on the market). A record of property sales in Decatur over the last five years (2019-2024) was used to find properties that sold in an affordable range. When considering for-sale properties, this analysis defined affordability as a sale price at or under the 120% AMI threshold, in alignment with the Decatur Affordable Housing Task Force’s definition of workforce housing. The analysis also identified the subset of properties affordable within the 100% AMI range. The table at the bottom of this page shows 2024 sale maximums that are determined to be affordable to 100% AMI and 120% AMI households.

Affordable sale price maximums are not constant year over year, tending to increase each consecutive year over the last five years. Instead of comparing sale price to the current affordability cutoff, the analysis related the sale price of the home in the year that it sold to the affordable sale price maximum for that home size for that year. For instance, if a

home sold in 2021, its sale price was compared to the affordable sale price maximum for 2021. Determination of affordability meant that the home sold at or below the 120% AMI affordable price for the year in which the sale was made. The analysis identified 222 unique properties that sold within the affordable range for a given year between 2019 and 2024. In all, 251 affordable sales were recorded, but this included duplicate properties that sold more than once between 2019-2024, each time within the affordable range. Affordability was determined purely by the sale price of the property compared to the sale price maximum for the 120% AMI range for the year of the sale and does not consider Property, Condominium, or Homeowner’s Association costs (P/C/HOA costs).

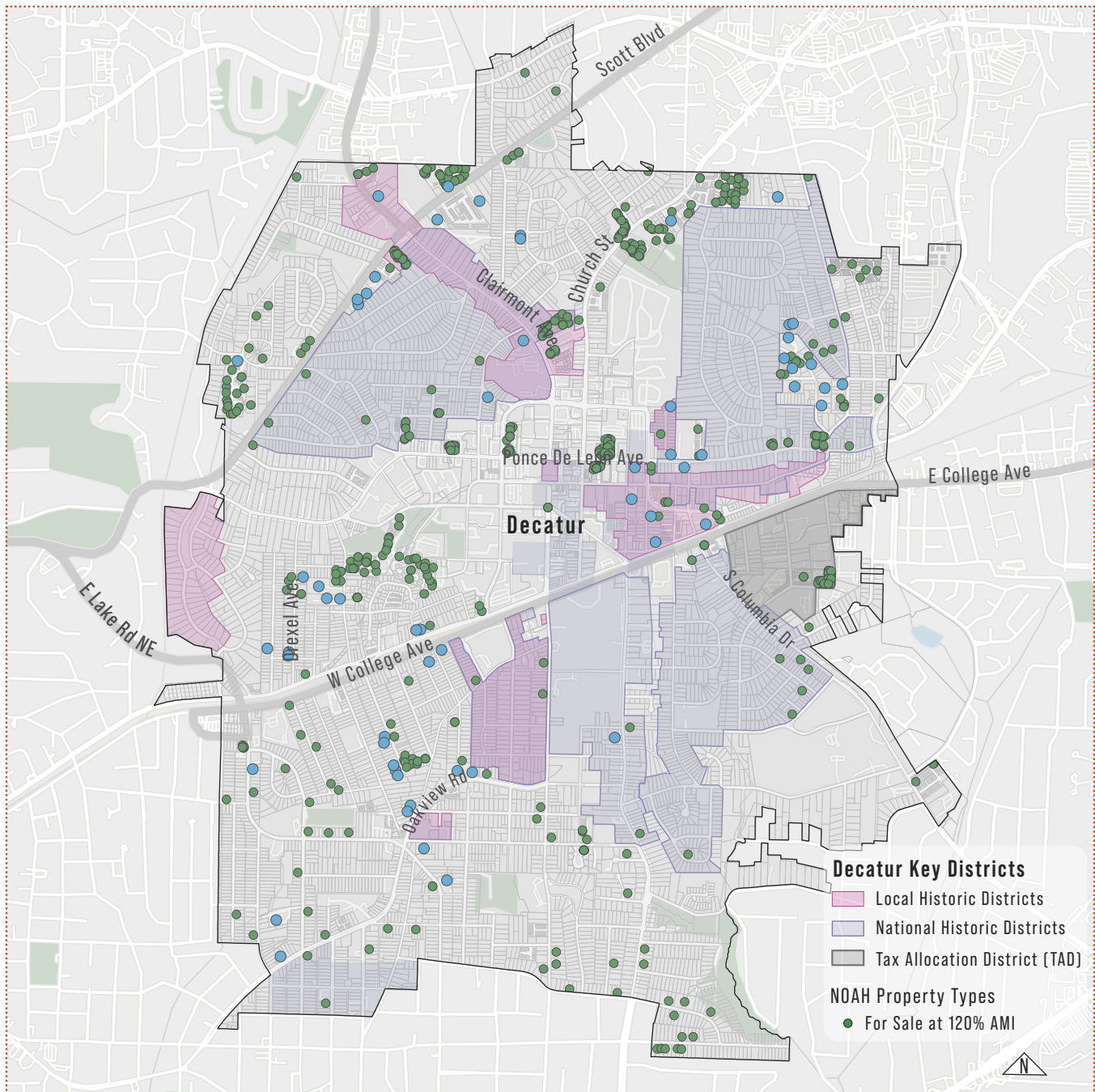
The record of unique sales included single-family units, townhomes, and condominiums. However, the vast majority of properties represented were townhome or condominium properties, which suggests that these housing typologies make up the bulk of the for-sale NOAH stock in Decatur. These identified buildings should therefore be considered priority targets for preservation granted that affordability is maintained.

SALE PRICE MAXIMUMS (2024), ATLANTA-SANDY SPRINGS-ROSWELL METROPOLITAN AREA (HUD)					
Unit Size	Efficiency	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
100% AMI	\$225,900	\$241,950	\$290,400	\$335,400	\$374,100
120% AMI	\$271,080	\$290,340	\$348,480	\$402,480	\$448,920

Sale Price Limits

Sale price limits convey what are designated as affordable sale prices for different home sizes for various area median income brackets. Homes selling at 120% AMI prices or below were identified as NOAH. [Source: Invest Atlanta]

NOAH INVENTORY



Potential Combined NOAH Inventory (For-Sale and Rental)

For-sale NOAH units were identified using sale price data from 2019-2024. Rental NOAH was identified by crosschecking previous NOAH inventories and researching to determine rental prices for units in the property. Prices and development activity are constantly in flux, and any of these properties may fall out of affordable ranges or be demolished and redeveloped in the future. Updating Decatur's NOAH inventory will take consistent effort and quality information.

NOAH INVENTORY

FOR-SALE NOAH INVENTORY (CONT.)

If at least one NOAH unit was found in a multi-unit building with for-sale units (townhomes and condominiums), only that unit (and not the total number of units in the building) was counted as a NOAH unit. This is the opposite of how rental NOAH unit totals were counted in the past and in this inventory.

This treatment may lead to some skew in an underestimation of the number of NOAH for-sale units. This inventory identified for-sale NOAH by sale occurrence and price over a five year period. However, there may be other NOAH for-sale units that did not sell in the last five years, including units in condominium and townhome properties where other NOAH units were identified. The opposite might also be true: an affordable unit that sold in a building may have been an exception compared to its pricier neighbors. Each condominium and townhome complex in which at least one NOAH unit was found should be assessed more closely as a unique case.

From a structural perspective, multifamily rental and multifamily attached for-sale properties like condominiums and townhomes are similar in that there are multiple units in one structure. Finding ways to protect and ensure affordability in these properties may protect more NOAH units overall than focusing exclusively on single-family NOAH.

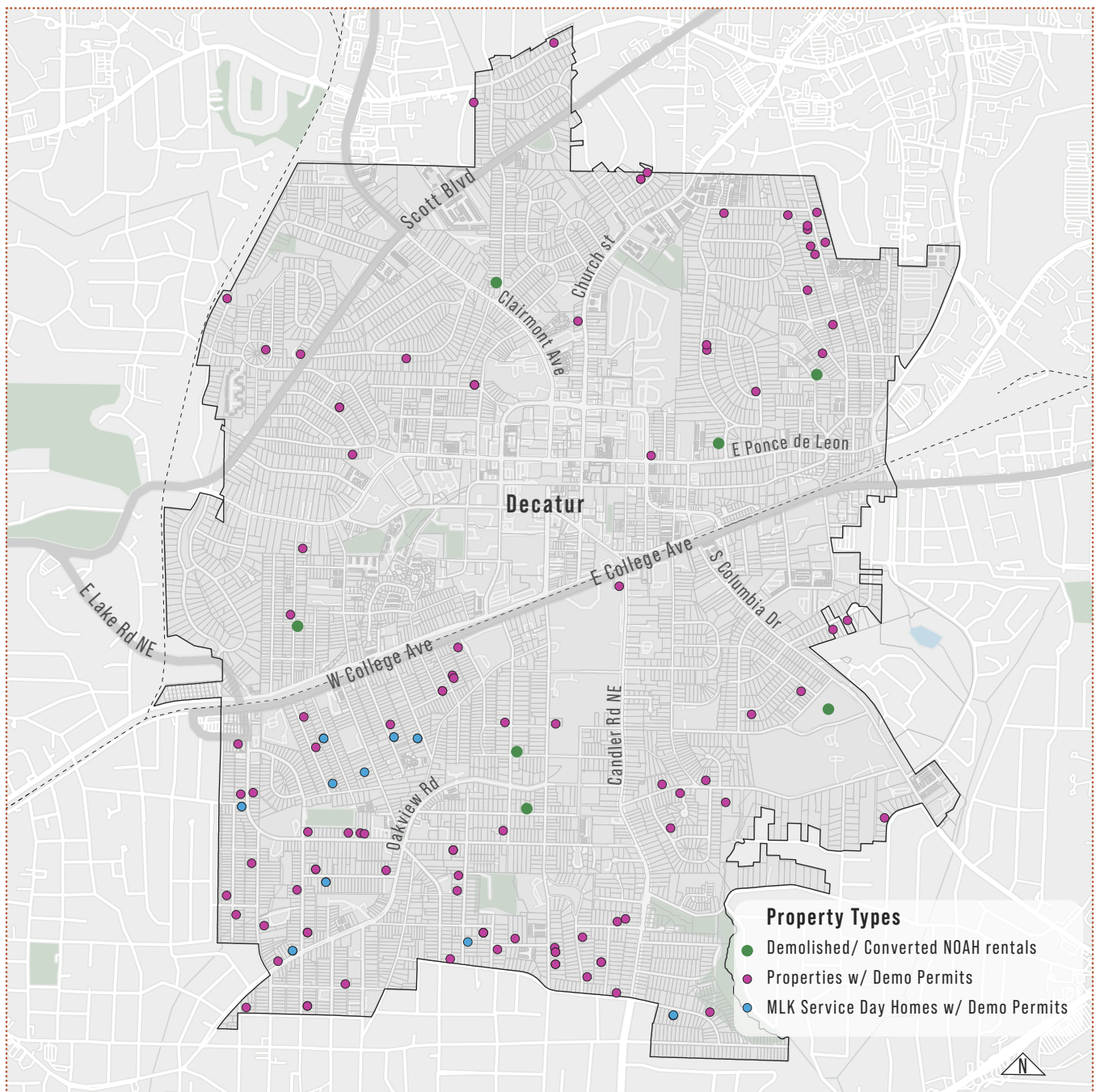
DEMOLITIONS

Demolition is a significant threat to NOAH properties because aging and relatively low-cost NOAH homes are often targeted as sites for new construction. In these situations, it may be more valuable to tear down the existing home and build a new home that will sell at a high price. Homes become good candidates for demolition under strong market pressure when the value of a new home outweighs the cost of demolition and construction.

Decatur has recorded residential demolition permits for 99 unique properties from the beginning of 2020 to February 2025. This does not mean that 99 homes have been demolished, as some permits may have been for partial demolitions and others may have been filed but not completed. Nor does it indicate that all the properties that were demolished were affordable homes.

Ten of the recorded permits were for properties that had participated in the MLK Service Project, an annual volunteer-led event that provides repairs to senior and veteran-occupied homes. The goals of the program are to help seniors and veterans remain comfortably in their homes by assisting with repairing the structures. Six of the ten properties with demolition permits filed in the last five years were confirmed to have been demolished. These homes were likely part of a dwindling stock of NOAH single-family properties remaining in Decatur.

NOAH INVENTORY



Demolition Permits by Address (2020 - Feb 2025)

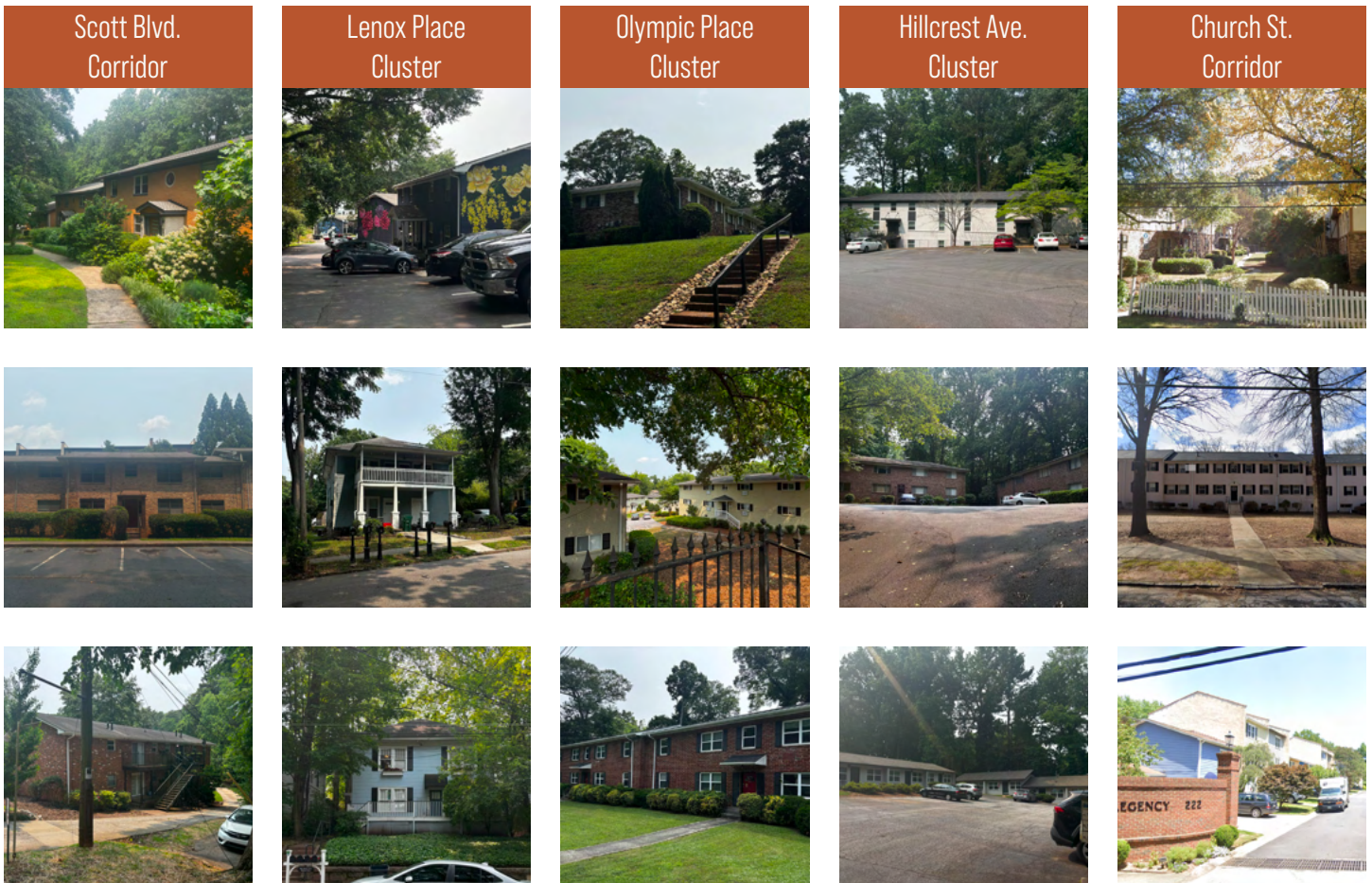
This map depicts address locations for filed demolition permits. Not all properties that applied for a demolition permit were granted a permit, nor does receipt of a permit always entail total demolition. For example, some homes that received maintenance assistance through the MLK Day of Service eventually filed demolition permits, but not all of these homes have been demolished to date. Demolished/converted NOAH rental units may have filed demolition permits for the property, or they were determined to have been demolished when cross-referencing previous NOAH inventories and with the property's current status.

CONCENTRATIONS OF NOAH IN DECATUR

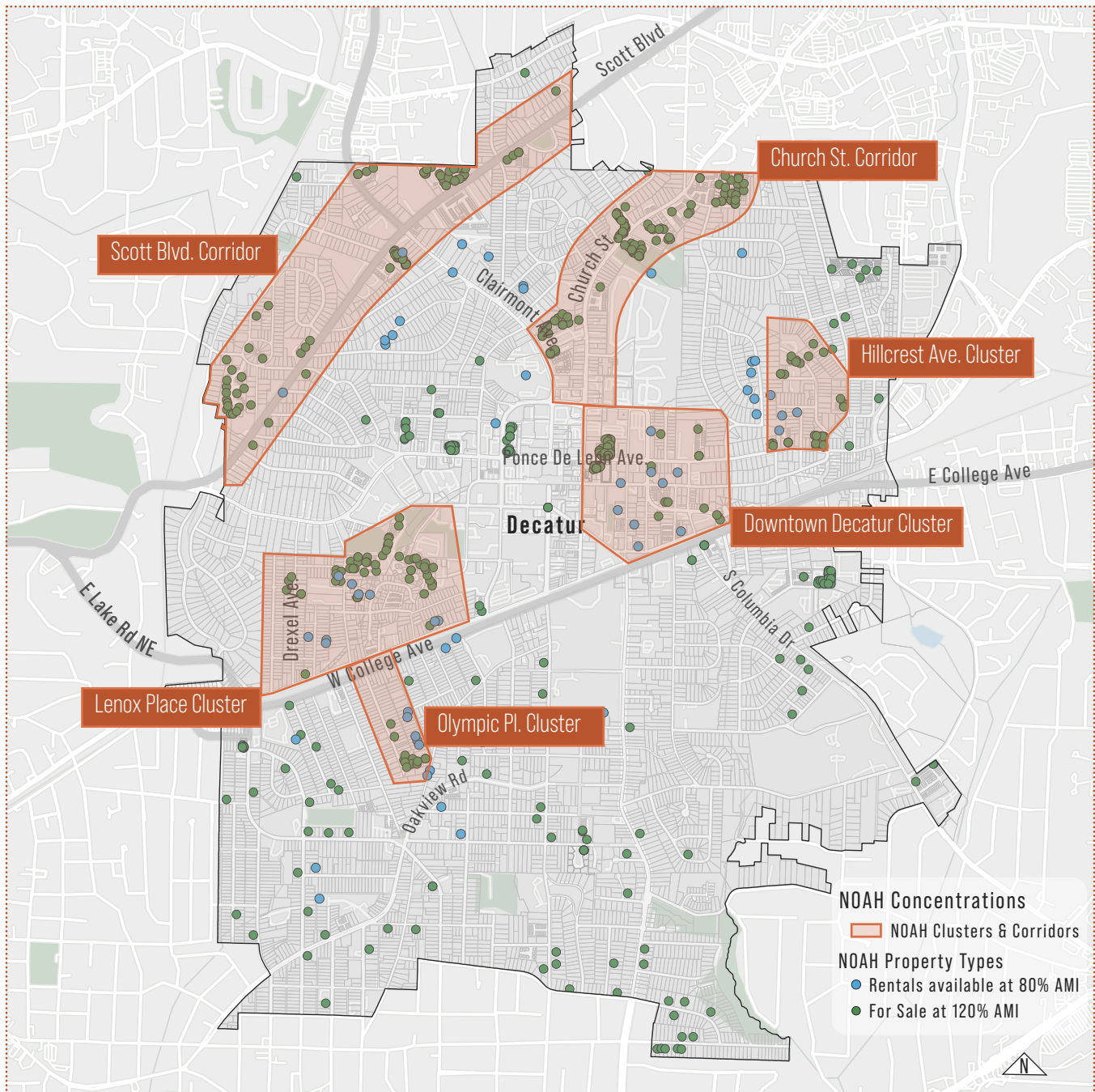
CONCENTRATIONS OF NOAH

The potential NOAH inventory process identified clusters and corridors of geographically concentrated NOAH units throughout Decatur. These zones have significant numbers of potential NOAH units in close proximity. They may represent groupings of older structures that were built around the same time, becoming more affordable as they aged, or sub-markets where housing prices are depressed. Regardless, these areas and their NOAH properties should be monitored and assessed for redevelopment risk, as market pressure there could lead to a high loss of NOAH units. On the other hand, reducing market pressure in these areas can benefit multiple NOAH properties. Furthermore, the cluster and corridors are prime targets for geographically restricted NOAH preservation strategies.

Each area has a distinct character and mixture of housing typologies shaped by its neighborhood's history and identity. Some are predominantly characterized by multi-unit garden apartment and condominium properties, while others contain a mix of small and large multifamily properties, including a notable presence of missing middle typologies. Single-family detached NOAH properties may also be present in these areas, though affordable single-family homes tend to be more scattered.



CONCENTRATIONS OF NOAH IN DECATUR



NOAH Clusters and Corridors

Potential NOAH properties identified in Decatur reveal some geographic pattern of clusters and corridors that can simplify and direct NOAH preservation strategies. They may also provide the basis for geographically restricted programs, policies, and practices for NOAH preservation that are not citywide. The boundaries drawn should serve as guidelines only.



Funding Mechanisms for NOAH Preservation

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UNDING MECHANISMS FOR NOAH PRESERVATION

Funding is necessary to initiate and sustain virtually any NOAH preservation effort. Though some efforts depend less on financial support than others, funding is the enabler of many of the strategies Decatur may choose to implement to preserve its NOAH units and create longer-term, deeper affordability.

A funding mechanism is a way to acquire funds to then put towards housing goals. Many of the following examples are simply sources of funding that may drive housing-supportive programs and actions. The most straightforward way to increase the funding capacity for housing uses of all types is to grow the existing Decatur Housing Trust Fund, a funding pool dedicated to housing-related activities, by any means available.

Ultimately, the source and nature of the funding does not matter—as long as it has flexibility to be applied to housing-supportive programs and activities—as much as what is done with it and how effectively it is leveraged. Funding mechanisms do not constitute NOAH preservation efforts in themselves, but they are a fundamental first step in building any complex strategy having a financial component, and as ways to build diverse and robust capital stacks for rehabilitation projects.



Funding Mechanisms for NOAH Preservation

HOUSING TRUST FUNDS (HTF'S)

Housing Trust Funds (HTF's) are pools of funding that governments at the state and local levels may establish to use for housing related needs. The specific uses of HTF's are outlined in each fund's policies and procedures, and the scope of uses can be broad or narrow based on these guidelines. Decatur created its Housing Trust Fund and adopted governing policies and procedures in 2023. The fund can be used for a wide variety of housing-related purposes, including land and property acquisition, rehabilitation, predevelopment services, and any other purpose that "helps address the City's goals and priorities of creating and preserving affordable housing." The HTF is funded primarily by annual appropriations from Decatur's general fund. The HTF may also be funded by payment-in-lieu fees of developments subject to the inclusionary housing requirements of the City of Decatur, in cases where the developer opts to pay into the fund instead of developing inclusionary dwelling units. Fees vary year to year, as established by the Decatur City Commission.

LOCAL HOUSING TRUST FUNDS

Housing Trust Funds are not only flexible in their use but also in the way funds can be deployed. For example, the funds can be deployed through loan programs that offer low-interest or otherwise favorable loans for housing-related purposes, or the HTF may be used to capitalize a revolving loan fund. Alternatively, the funds can be awarded as grants, which do not require repayment. Both loan and grant awards are permitted under Decatur's HTF policies.

However, the potential impact of a Housing Trust Fund is limited by the size of the fund. The key challenge for the Decatur HTF is ensuring reliable and robust financial contributions year over year. As mentioned, Decatur's HTF is funded by annual appropriations from the general fund, but these payments may be discontinued at any time at the discretion of the City. Importantly, Housing Trust Funds in Georgia cannot be funded through dedicated revenue, which is a source of revenue that is committed by law to a specific purpose, without authorization from the Georgia General Assembly. The Assembly must authorize localities to pursue new or additional sources as potential dedicated revenue for local HTF's.

Portions of real estate transfer taxes and fees and property taxes provide dedicated revenue to HTF's outside of Georgia, while others rely on parking fees, sale of unclaimed property, and developer fees, among other options. In some states, revenue from property taxes in Tax Increment Financing (TIF's) can be put towards local Housing Trust Funds. While dedicated revenue sources remain unavailable to local HTF's in Georgia, a way to stretch the efficacy of the existing funds is to require match funding for any disbursement from the HTF and to set repayment terms for loans.

STATE HOUSING TRUST FUNDS

The State of Georgia also maintains a State Housing Trust Fund for the Homeless, which is funded from general appropriations at around \$3 million a year. The funds are disbursed by the Department of Community Affairs (DCA) to local governments to serve homeless or imminently homeless households, though the state has a statutory right to use the funds for other activities (e.g. construction, rehabilitation, etc.). The fund has the drawbacks of relying on annual appropriations, rather than dedicated revenue sources, and a limited scope of use.

Some states, like Florida and Iowa, have state HTF's with explicitly broader scopes and that make disbursements to counties and municipalities to fund local housing programs and activities. Georgia may opt to grow its State Housing Trust Fund by dedicating a tax or fee revenue, expanding the housing-related activities that the fund will support, and making disbursements from the fund to counties

HOUSING TRUST FUNDS

and municipalities. This option would guarantee some level of funding to local governments for housing purposes beyond their local budgets and/or local Housing Trust Funds.

KEY ROLE(S):

- City of Decatur, Georgia Municipal Association, Association of County Commissioners of Georgia

CASE STUDIES:

1. State Housing Trust Funds

1. Florida State Housing Initiatives Partnership (SHIP): This program is supported by the Local Housing Trust Fund (a state fund that is divvied up locally), one of two state Housing Trust Funds in Florida. The fund is supported by revenue from Florida's documentary stamp tax, equivalent to a real estate transfer tax.
2. Iowa Local Housing Trust Fund (LHTF) Program: This program (a state fund that is divvied up locally) disburses funds from the state to 26 Housing Trust Funds that collectively serve all 99 Iowa counties. Funds are distributed through a competitive application process.

2. Local Housing Trust Funds

1. Georgia: Atlanta Affordable Housing Trust Fund, Savannah Affordable Housing Trust Fund, Macon-Bibb County Affordable Housing Fund
2. Austin Housing Trust Fund, Barnes Housing Trust Fund (Nashville, TN), Charlotte Housing Trust Fund, Baltimore Affordable Housing Trust Fund

ACTION(S):

1. Continue the annual allocation to the Housing Trust Fund at the current level or above. Consider if higher levels of funding can be allocated annually.
 1. Consider levying or increasing fees or taxes under local government control to augment the general fund. This would in turn enable greater annual contributions to the HTF.
2. Consider revising applicant eligibility for the HTF to allow individuals, HOAs and POAs, and multifamily rental owners to apply for assistance, or to apply for assistance in partnership with non-profits.
3. Use the HTF to leverage additional private and philanthropic investments.
4. Report regularly (annually or biannually) on the impact of the HTF.
5. Consider revising the policies and procedures of the HTF to require a level of match funding for any disbursements, or create programs that operate using funds from the HTF that require match funding.
6. Determine loan terms and repayment conditions for loans disbursed from the HTF.
7. Advocate for legislation to create a dedicated source of revenue for Georgia's state Housing Trust Fund, which currently relies on annual appropriations, to increase the fund. Simultaneously, advocate to expand use of the funds to support a wider range of housing-supportive activities, and for these funds to be distributed to counties and municipalities on some qualifying basis.
8. Advocate for the Georgia General Assembly to allow local governments to opt to use some new or additional local funding sources as dedicated revenue for local Housing Trust Funds.

HOUSING TRUST FUNDS

1. GEORGIA LOCAL HOUSING TRUST FUNDS - FUNDING

Name (Year Established)	Initial Funding	Continued Funding
City of Atlanta Building the Beloved Community Affordable Housing Trust Fund	General fund allocation; one-time contribution from a developer for tax break incentives	General fund; housing bonds against HTF revenue
Savannah Affordable Housing Fund (2011)	General fund allocation	General fund; private contributions from businesses, foundations, nonprofits, and individuals
Macon-Bibb County Affordable Housing Fund (2023)	Grants (American Rescue Plan Act & State and Local Fiscal Recovery funds)	Unknown or not designated
Decatur Housing Trust Fund (2008)	General fund allocation	General fund; inclusionary zoning policy in-lieu fees

2. DEDICATED REVENUE SOURCES IN OTHER STATES' HOUSING TRUST FUNDS

Location	Dedicated Funding Sources	Other Funding*
Local Housing Trust Funds		
Austin, TX	Property taxes from formerly city-owned properties	Tax-increment financing; property sales
Highland Park, IL	Demolition permit fee; affordable housing demolition tax	One-time seed contribution
Baltimore, MD	Tax increment financing; recordation and transfer taxes	Bonds
Pittsburgh, PA	Realty transfer tax	One-time seed grant from general fund
Ashland, OR	City's portion of state marijuana tax	Donations; sale of city property; grants
State Housing Trust Funds with Local Disbursements		
Florida	Real estate transfer tax (documentary stamp tax)	-
Indiana	Document recording fee	-
Arizona	Sale of unclaimed property (typically due to lack of a will)	-

*List of other funding sources is not exhaustive, and sources may or may not be dedicated.

EXTERNAL FUNDING OPPORTUNITIES

EXTERNAL GRANTS - GOVERNMENTAL GRANTS

Community Development Block Grants (CDBG) and the Community HOME Investment Program (CHIP) are two grant opportunities programs could be used for NOAH preservation initiatives in Decatur.

CDBG funds are administered through the U.S. Department of Housing and Urban Development (HUD) and can be applied to housing rehabilitation and neighborhood revitalization goals. CDBG funds can be utilized in a Housing Trust Fund as a source of funding for rehabilitation programs administered through the fund, and they can be used to capitalize revolving loan funds. Alternatively, CDBG funds can be used to support NOAH property acquisition and preservation.

Community HOME Investment Partnership (CHIP) funds are granted to local governments, nonprofits, and public housing authorities for rehabilitation of owner-occupied single-family homes or construction and reconstruction of affordable single-family homes. These funds are administered by the Georgia Department of Community Affairs. Decatur may apply for CHIP funds to rehabilitate NOAH properties. Homes identified for rehabilitation by the MLK Service Project and Decatur Home Rehabilitation Program can potentially benefit from CHIP funds, which would extend the programs' reach to serve additional households.

EXTERNAL GRANTS - PRIVATE GRANTS

Grants from private sources, such as private foundations and social impact funds, present other options for acquiring funding to support housing preservation activities or to potentially capitalize a Housing Trust Fund. The availability of private grant monies and the intended goals of funding opportunities may vary year to year. Some private funding opportunities narrowly define qualifying activities or uses, while others have broad uses. Funding opportunities may target specific demographics, income groups, geographies, or have other restrictions.

Decatur may be eligible to apply to the following private funding opportunities: WORTH Atlanta Homeownership Collaborative (Wells Fargo), Home Depot Veteran Housing Grants, Truist Foundation Grants, Woodruff Foundation Grants, True Inspiration Awards (Chick-Fil-A), Georgia Pacific Social Stewardship Grants, or Turner Multifamily Impact Fund opportunities. Some of these may be used to support existing programs and initiatives in the City of Decatur, and some are only open to 501(c)3 certified organizations. More research should be done to identify additional private funding opportunities than those enumerated here.

EXTERNAL FUNDING OPPORTUNITIES

KEY ROLE(S):

- City of Decatur, DeKalb County, Decatur Housing Authority, Decatur Land Trust

CASE STUDIES:

1. One-time funding opportunities can provide pivotal capital to local Housing Trust Funds, as some municipalities have demonstrated.

1. Macon-Bibb County seeded an affordable housing fund with grant money from the American Rescue Plan Act (ARPA) and State & Local Fiscal Recovery (SLFR) funds.
2. The Barnes Housing Trust Fund in Nashville, TN was funded partly through an Urban Development Action Grant and local HOME funds.

ACTION(S):

1. Discuss possibilities for future CDBG grant applications with DeKalb county to fund housing rehabilitation efforts in Decatur and to supplement the Housing Trust Fund. Ensure that programs and initiatives through CDBG in Decatur do not conflict with DeKalb programs.
2. Identify opportunities to apply for CHIP funds, with eligible applicants including the City of Decatur, Decatur Housing Authority, or Decatur Land Trust to support the Decatur ReHab program.
3. Consider working with an internal or contract grant specialist to identify and apply to private grant opportunities.

EXTERNAL FUNDING OPPORTUNITIES - HISTORIC PRESERVATION

Some funding opportunities are available to assist renovations of historic properties. These could be put towards renovating eligible historic properties that contain NOAH units.

Within the available pool of private funding opportunities, there are some intended to support historic preservation efforts specifically. Grants awarded by the 1772 Foundation are one example. These matching grants can be used to support historic building preservation and are issued through partner organizations in several states. The Georgia Trust for Historic Preservation is the partner organization for 1772 Foundation grants in Georgia.

The Georgia Trust for Historic Preservation also operates the Endangered Properties Revolving Loan Fund, which distributes funding to rehabilitate properties of historical and architectural significance. The process starts with the Trust committee identifying a property of significance and negotiating purchase from the current owner. The Trust then applies a rehabilitation agreement to the property through a Historic Conservation Easement before selling it to a new owner who commits to restore the property. The proceeds from the sale replenish the revolving loan fund.

Between 2018-2020, the Trust partnered with the Atlanta Land Trust (ALT) to renovate two historic single-family homes in the Washington Park neighborhood and maintain affordability in the homes at 80% AMI. ALT purchased the properties from the Trust, adding them to their portfolio. In this project, ALT was relieved of contracting the renovations because the Trust managed them directly. The result was two preserved homes with guaranteed long-term affordability through incorporation in the land trust, which caps future sales to a threshold of 25% of a property's appreciated value.

This partnership model could potentially be replicated in Decatur with the Decatur Land Trust, if a property of historic and architectural significance is identified.

KEY ROLE(S):

- City of Decatur, Decatur Land Trust, Georgia Trust for Historic Preservation

CASE STUDIES:

1. Preserving Historic Housing in Atlanta's Washington Park Neighborhood (ULI case study)

1. This effort utilized funds from the Georgia Trust for Historic Preservation's revolving loan fund and a grant from the 1772 Foundation. The project was completed in partnership with the Atlanta Community Land Trust.

ACTION(S):

1. **Identify residential properties of historic significance requiring renovations. Contact the Georgia Trust for Historic Preservation to see if they would be willing to acquire properties, or to jointly identify properties of interest. Gauge feasibility of structuring a process facilitating renovation and transfer to the Decatur Land Trust.**
 1. Identify grant opportunities that could help fund the renovation process (e.g. 1772 Foundation).

TAX ALLOCATION DISTRICT (TAD) FUNDS FOR HOUSING PURPOSES

Tax Allocation Districts (TAD) are “a mechanism to recirculate current or future tax revenues within a designated site or district back into that district to incentivize or catalyze investment and development.”¹ A TAD does not increase taxes to property owners. Rather, it changes the allocation of an incremental amount of collected property taxes within a specified district. Every TAD is unique in its focus areas, though generally TAD’s seek to address blight, physical or economic stagnation, or inadequate infrastructure. TAD funds can be utilized for direct investment in a particular site or in broader infrastructure improvements within the district boundaries. NOAH properties could thus receive TAD funds for either direct building remediation, or they could benefit from infrastructural improvements in the area.

The City of Decatur has one active TAD, called “TAD #1: East Decatur” which is focused around the Avondale Estates MARTA station. The TAD was created in 2015 “for the purpose of encouraging private investment within this area of the city.”² The particular method to do so is to provide infrastructure improvements to the area with TAD funds. The East Decatur TAD legislation outlines a list of benefits that TAD projects must offer as a return on public investment. These benefits include:

- 1. Increasing the percentage and affordability levels of affordable rental housing, thereby adding a greater percentage or lower AMI levels than indicated in the City of Decatur Mandatory Inclusionary Housing Ordinance;**
- 2. Increasing the supply of affordable ownership housing within the city limits;**
- 3. Increasing the supply and quality of available housing products for the elderly;**

At the time of the TAD’s creation in 2015, the area was characterized by vacant industrial buildings and large parking lots. Much has changed since 2015, with a number of key redevelopment projects occurring within and in close proximity to the TAD – particularly surrounding the Avondale MARTA station.

The East Decatur TAD has a requirement of a minimum project size of \$7.5 million. It is extremely unlikely, if not impossible, for rehabilitation of single family structures to meet this threshold. Multi-family condo units could theoretically apply for TAD funds, but stipulations on sale prices would need to be negotiated with individual owners. Multifamily rental property, then, would be the best fit for TAD funds to renovate or provide significant maintenance. Enforcement of rent ceilings – a possible stipulation as a result of receiving TAD funds – is administratively viable as it involves coordination with a single owner for many units.

An example of a new construction project that received TAD funding in 2021 is the Northwood Raven Apartments development. 41 units in the development will be reserved for households at 80% AMI, per the city’s inclusionary housing ordinance. Public benefits of the development include new street connections, greenspace, and improved infrastructure for walkability.

¹ KB Advisory Group (2024)

² Tax Allocation District Policies and Procedures (2021)

TAX ALLOCATION DISTRICT FUNDS

However, most of the existing properties within the TAD boundaries are industrial or commercial, there are few properties that would be a good fit for utilizing TAD funds as a NOAH preservation strategy. The Tally Street Lofts, built in 2007, are within the TAD and had a handful of condominium units identified in the NOAH inventory. No NOAH rentals were identified in the TAD. Expanding the existing TAD boundary or establishing a new TAD that encompasses multiple NOAH properties would potentially allow funding to pass to those properties for rehabilitation and preservation.

KEY ROLE(S):

- City of Decatur

CASE STUDIES:

1. Portland Housing Bureau (PHB) Home Repair Loan Program

1. This repair loan program makes favorable-term loans for eligible repair activities in designated Tax Increment Financing (TIF) districts. Funds from the TIF districts support the program.

2. Chicago Multi-Family TIF Purchase-Rehab Program

1. Utilizes TIF funding to assist developers to purchase and rehabilitate vacant or underutilized buildings within the TIF district.

ACTION(S):

1. Consider expanding the existing TAD boundaries to encompass NOAH properties, especially multifamily properties whose rehabilitation needs may meet or exceed the \$7.5 million project size minimum.
2. Consider creating a new TAD that encompasses NOAH properties and that could facilitate funds to those properties for rehabilitation and preservation.
 1. Consider adopting a reduced project minimum budget to allow smaller eligible funding requests.

ACCESSORY FUNDING MECHANISMS

GEORGIA HOUSING & FINANCE AUTHORITY LOANS

The Georgia Housing and Finance Authority is a bond-issuing entity whose purpose, among others, is to provide public financing and financial assistance to provide safe, decent, energy efficient, appropriate, and affordable dwelling accommodations for persons of low or moderate income. The Authority issues bonds that finance the Georgia Dream Program.

The Authority can also issue revenue bonds in order to make loans. A loan from the Georgia Housing and Finance Authority partially funded the renovation of Capitol View Apartments in Atlanta's Adair Park neighborhood. The renovation of the multifamily development created deeper, long-term affordability for residents. Decatur may choose to inquire about or pursue a loan from the Authority for large-scale renovations if the goals and conditions of the renovation align with the Authority's goals.

NEW MARKET TAX CREDITS

New Market Tax Credits (NMTC's) are an incentive mechanism to encourage private investment. NMTC's must be applied to projects in census tracts that meet specific criteria, such as having a median household income of 80% or less than the metro median, and projects or activities must have a commercial component. NMTC investment is facilitated by a Community Development Entity (CDE). NMTC's may be a viable source of financing to preserve NOAH units in mixed-use properties if they are in a qualifying census tract.

LINKAGE FEES

Linkage fees are similar to impact fees in that both are fees that can be assessed on new development to generate funds that ultimately support affordable housing, among other priorities. While impact fees are typically levied on residential developments to fund improvements to public facilities, linkage fees can be assessed on all new non-residential development. Linkage fees can therefore be a viable funding mechanism in areas experiencing rapid commercial growth. More research is needed to ascertain the opportunity of levying linkage fees in Georgia on non-residential development to support affordable housing.

BOND ISSUANCE

Housing bonds provide another viable mechanism for funding the development of affordable housing or the rehabilitation of NOAH. These government-issued loan agreements are financed by private investment, with the promise of repayment at a future date. Housing bonds often offer tax-exempt interest which helps reduce borrowing costs for affordable housing development. Local housing authorities (e.g., Decatur Housing Authority) are responsible for issuing tax-exempt housing bonds, while the Georgia Department of Community Affairs oversees the statewide bond allocation program. To secure a bond allocation, the local issuing authorities must approve the project, hold a public hearing, have local government approval, and have general financing in place.

Alternatively the City of Decatur may issue general obligation bonds to raise funds that could then support rehabilitation of NOAH and other affordable housing activities.

ACCESSORY FUNDING MECHANISMS

PUBLIC-PRIVATE PARTNERSHIPS

Public-private partnership refers to mutual aid across sectors not only in financing an initiative but also in collaborating throughout its duration. As a funding mechanism, public-private partnership refers to combining funding sources from different sectors to build robust, diversified capital stacks. Many capital stacks include funding from public, private, and philanthropic sources, including organizations like local governments, foundations, non-profits, and Community Development Financial Institutions (CDFI's). It is often necessary to acquire funding from diverse sources to meet the budgetary needs of a complex project or program. Initiatives that are backed across sectors may receive better financial and general support, making them more likely to succeed.

Organizations that coordinate multiple avenues of funding, like private investment incentives and public financing resources, make partner initiatives more likely to succeed. Invest Atlanta, for instance, fulfills the role of communicating funding opportunities, forging partnerships, and other activities necessary to make many initiatives a reality. A similar function may one day be fulfilled by an organization working to bring private, public, and philanthropic investment exclusively to Decatur and the surrounding area.

ACTION(S):

1. Consider issuing general obligation bonds or housing bonds to fund NOAH rehabilitation efforts or to increase the Housing Trust Fund.
2. Explore opportunities to use New Market Tax Credit financing in Decatur for multifamily rehabilitation in developments that have the requisite commercial component.
3. Foster public-private partnerships to secure diverse financing for affordable housing initiatives, including rehabilitation.
4. Explore the opportunity to levy linkage fees on non-residential developments.



STRATEGIES FOR NOAH PRESERVATION

Strategies for NOAH preservation come in many different shapes and sizes. A program that has a NOAH preservation goal is a strategy, as well as a policy that espouses a similar goal, as well as a best practice in housing preservation. These are all individual “strategies.”

A program typically has a set of criteria that defines who is eligible to participate, what uses the program supports, and what kinds of assistance or benefit it will provide in intending to fulfill its stated purpose (e.g. a loan program that provides loans for housing repairs to rehabilitate NOAH properties). A policy is a rule that may ban, allow, challenge, or make easier certain activities to effect a desired outcome. A strategy may also be a practice used to support NOAH preservation goals or make achieving them more likely.

Lastly, a strategy is also an overarching course of action that combines programs, policies, and practices, enabled and sustained by funding mechanisms, to achieve a goal. In other words, the ideas and topics in this chapter can—and should, wherever possible—be combined in a complementary way to build a diverse strategic approach to preserving Decatur’s NOAH units.



Strategies for NOAH Preservation

LOAN AND GRANT PROGRAMS AND REVOLVING LOAN FUNDS

NOAH property owners often struggle to access capital to perform necessary repairs and building updates. This is particularly an issue for multifamily building types, such as condominiums, in procuring desirable loans from conventional lenders as compared to single-family homeowners.

Decatur may opt to disburse loans and grants for NOAH preservation. While these loans and grants could be funded through a separate funding pool, the most likely source is the Housing Trust Fund (HTF), which is already authorized to disburse loans and grants. Such grants and loans can bridge financial shortfalls for NOAH property owners who cannot acquire favorable loans from conventional banks, enabling repairs and extending the life of the NOAH property. Loans from the HTF can offer lower-interest rates and more lenient repayment terms than commercial lenders. Loans and grants for NOAH preservation may need to come with conditions to ensure or extend affordability following receipt of funding.

Alternatively, Decatur may initiate a revolving loan fund geared towards affordable housing preservation. The difference between a standard loan program and a revolving loan fund is that the latter is designed to replenish itself from interest and principal payments made on prior loans issued from the fund. The obvious advantage of a revolving loan fund program is that it is self-replenishing. Possible drawbacks are that interest rates and repayment periods must be set to ensure that the fund makes a positive return on investment.

KEY ROLE(S):

- City of Decatur

CASE STUDIES:

1. Lancaster County Whole Home Repairs Program (Lancaster County, PA)

1. The Lancaster County Whole Home Repairs Program assists qualified homeowners in Lancaster City and Lancaster County with needed home repairs to address issues such as safety, security, livability concerns, accessibility, and energy efficiency.

2. Multi-Year Affordability through Upfront Investment (Chicago, IL)

1. Multi-Year Affordability through Upfront Investment (MAUI) is a loan available to small developers that is used to create affordable housing and assist with housing rehabilitation.

3. Small Building Program (Washington D.C.)

1. The Small Building Program, part of Washington DC's Department of Housing and Community Development, is a funding source available to affordable housing property owners. Eligible properties must have between 5 to 20 units and the repairs need to address issues concerning safety and environmental hazards.

ACTION(S):

1. Begin to offer competitive grants and loans from the HTF to NOAH properties that may apply for funding.
2. Capitalize a revolving loan fund that will be self-replenishing, providing a source for loans into the future. Note that seed funding for a revolving loan fund may come from the Housing Trust Fund and/or other funding sources. Grants like Community Development Block Grants are common sources for the capitalization of revolving loan funds.

ACQUISITION AND MANAGEMENT OF EXISTING NOAH PROPERTIES

The primary threat to NOAH is market pressure that leads to rising rent and sale prices, putting home prices beyond an affordable range, or a case where the value of the land value exceeds the improvement value of the property, which may lead to teardown and redevelopment. Market pressure can be reduced or eliminated if property is acquired by a governmental entity, land trust, or a mission-oriented organization.

Governmental entities like downtown development authorities, housing authorities, or local governments themselves can acquire property and reduce market pressure. If a NOAH property is acquired by a public entity owner, that entity can continue to manage the property as a not-for-profit venture. Public entity ownership can mitigate increasing housing prices by putting the property in a tax-favored condition and utilizing any other incentives and advantages available to public agencies. Local governments may also lease land and property to private property managers at a discounted rate, thereby making it financially viable for property managers to offer lower housing rates. In some cases, housing authorities acquire and manage existing properties. The Decatur Housing Authority, for example, has acquired property that they manage and continue to lease at affordable rates. The Reno Housing Authority is an out-of-state example of a housing authority that has also seen success with acquiring existing properties to boost the local affordable housing stock. In both cases, responsible fiscal stewardship has allowed these agencies to expand their portfolios. Other governmental agencies may be able to finance similar efforts, and multiple agencies may cooperate to combine resources to purchase property to advance a shared goal of preserving affordable housing.

Owning property affords the highest degree of control to public entities, who may choose to use the property for affordable housing goals. However, purchasing property requires significant capital resources, while managing residential units requires ongoing effort.

KEY ROLE(S):

- City of Decatur, Decatur Housing Authority, Decatur Land Trust

CASE STUDIES:

1. Reno Housing Authority

1. One of many housing authorities who have actively acquired and managed existing properties. The Reno Housing Authority deliberately acquires and maintains a diverse portfolio of property types in many parts of the city.

2. Decatur Housing Authority

1. The Decatur Housing Authority has acquired existing residential properties to manage additional units.

ACTION(S):

1. Provide mutual, inter-agency support to acquire NOAH properties threatened by redevelopment.

PAYMENT IN-LIEU OF TAXES (PILOT) AND TAX ABATEMENTS

A tax abatement is a discounted tax rate that is usually offered as an incentive to a property owner. Tax abatements can apply for a fixed period of time, and they can be structured to remain constant or to graduate incrementally, such as year-by-year, to the full tax rate.

Payment in Lieu of Taxes, or PILOT, programs are programs that utilize an incentive, like a tax abatement, in exchange for a payment that may be a good, service, or provision of a public benefit, such as a guarantee of affordable housing.

Among many other goals and uses, PILOT programs can be used to incentivize new affordable housing units or maintain existing ones. It is unlikely that there are PILOT programs in Georgia with affordable housing goals, but local governments in other states have used them for this purpose. Chattanooga, TN utilizes a PILOT program to incentivize private developers to create new affordable housing units by offering a tax abatement that is directly tied to the cost of offering the affordable units. This means that the tax abatement is calculated based on the number and type of affordable units the developer is providing (the city provides a PILOT calculator to assist developers in determining their potential tax incentive). Chattanooga can offer tax abatements on property taxes despite state restrictions by transferring the property to a governmental entity. Tax-exempt governmental entities can hold the title of the property and lease it back to the owner at a cost that factors in the discounted tax rate.

Like in Tennessee, Georgia's constitution does not allow local governments to grant tax abatements on property taxes except in specific cases. Therefore, any PILOT program that utilizes tax abatements as an incentive will likely need to operate in a fashion where title to property is transferred to a governmental entity and leased back to the owner. Municipalities in Georgia can conceivably adopt a PILOT program that offers a tax abatement incentive for retaining affordable units, for instance with a commitment by a property owner to continue to sell lease one or more units at a rate deemed affordable according to specific criteria, but they will not be able to institute a PILOT program directly.

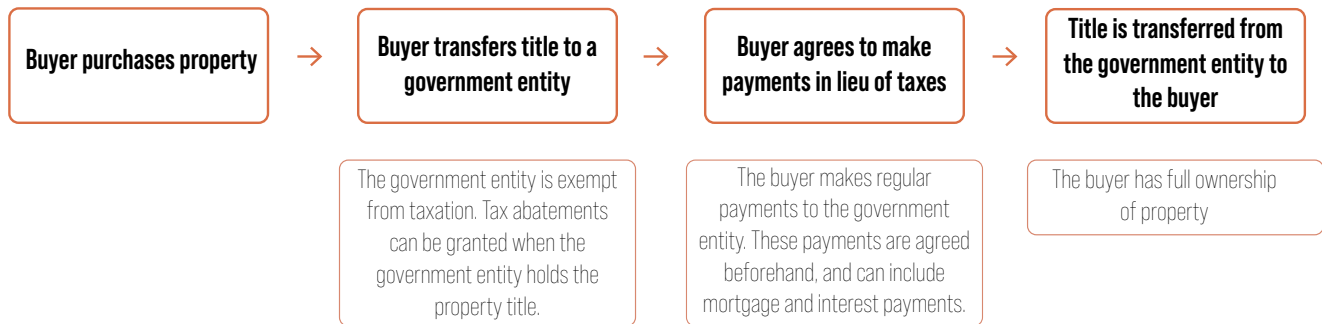
Outright tax abatements or abatements through a PILOT program may be difficult to apply to many properties, especially if title must be acquired by the governmental entity piecemeal for each property. The fees associated with transfer of title may be too costly to make a substantial abatement feasible. However, if multiple property titles could be transferred at once, in a batch, the savings that result from combining multiple transfers could make a widespread tax abatement on existing affordable units a realistic possibility.

Allowing local governments to offer tax abatements directly, instead of a governmental agency having to first acquire title and lease back to an owner, would likely require an advocacy effort at the level of the General Assembly to broaden the powers of local governments to offer tax abatements in general, or for specific purposes like retaining existing affordable housing units.

PAYMENT IN-LIEU OF TAXES (PILOT) AND TAX ABATEMENTS

Bond for Title Process

An approach that can facilitate property tax incentives in exchange for providing affordable units through an agreement with a government entity.



KEY ROLE(S):

- Decatur Development Authority, Downtown Decatur Development Authority, City of Decatur, Georgia Municipal Association, Association of County Commissioners of Georgia

CASE STUDIES:

1. Chattanooga PILOT for Affordable Housing

- This is a tax incentive program designed to encourage mixed income and affordable unit rental development in Chattanooga. The Payment in Lieu of Taxes grants tax abatement to developers in exchange for providing affordable units. The program requires that the developer commits to a 15-year period during which the title of the property is transferred to the Health, Educational, and Housing Facility Board of the City of Chattanooga.

2. Florida Tax Exemptions for Affordable Housing

- As of July 2024, there are six different types of affordable housing- related property tax exemptions available in the state of Florida. Each program has different eligibility criteria and degrees of property tax exemptions available based on the number of units that are affordable to qualifying households.

ACTION(S):

- Advocate for the General Assembly to pass legislation that would allow local governments to offer tax abatements outright to residential property owners leasing affordable units.
- Create a process whereby property owners can apply for tax abatements through a PILOT program. A PILOT program for affordable housing would need to operate similarly to the Chattanooga PILOT program in that title should be held by a downtown development authority or other governmental tax-exempt organization.
- Create a process whereby multiple NOAH properties can be bundled together under one bond-for-title transaction to limit associated title transfer and other fees. The title should be held by a downtown development authority or other public agency.
- Explore the possibility for other public agencies, such as housing authorities, to hold title to property providing affordable units in exchange for reduced payments.

PREFERENTIAL ASSESSMENT FOR EXISTING AFFORDABLE HOUSING

Although local governments may not offer tax abatements to property owners in most cases, lower tax payments for properties providing affordable housing units can be achieved through a preferential assessment program. Preferential assessments achieve the same effect—a lower property tax payment—through different means than an abatement or exemption. Under preferential assessment programs, the value of the property or some component of it (e.g. land value) is assessed at a lower rate than other properties, resulting in a lower tax payment rather than a discounted one. Properties are eligible for preferential assessments if they meet the criteria stipulated by the assessment program.

Preferential assessment programs are not unfamiliar in Georgia, but they are used to incentivize benefits other than affordable housing. Conservation Use Valuation Assessment (CUVA) and Preferential Agricultural Assessment are two examples of preferential assessment programs in Georgia, the former incentivizing conservation, agricultural, or timber use, and the latter also supporting agricultural uses. For example, CUVA incentivizes conservation and agricultural uses by allowing property to be assessed at its current use value rather than the fair market value for a period of ten years. Preferential assessments for brownfield properties, historic properties, and timber and fiber are other preferential assessments offered in Georgia.

Local governments may advocate for a new preferential assessment program that targets existing and new affordable housing to promote affordable housing development and preservation. Since 2021, Illinois has offered preferential assessment for eligible properties providing affordable housing. The level of the assessment incentive depends on the percentage of affordable units provided and the cost of construction or rehabilitation. Existing properties must perform some rehabilitation action to qualify. Enacting a similar program in Georgia will require legislative action by the General Assembly.

KEY ROLE(S):

- City of Decatur, Georgia Municipal Association, Association of County Commissioners of Georgia

CASE STUDIES:

1. Illinois Affordable Housing Preferential Assessment Program

1. This program provides and preserves affordable rental homes across the state of Illinois. Qualifying properties must be multi-family containing a minimum of 7 rental units. To be eligible for the assessment program these properties must allocate as least 15% of the units to be affordable for low- income households for a period of 10 years.

2. 4D Affordable Housing Incentive

1. The 4D Affordable Housing Incentive aims to preserve affordability, reduce energy use, and foster healthy homes in Minneapolis. This incentive program is designed for owners of market-rate multifamily properties who meet certain criteria as outlined by the program. If property owners keep 20% or more of their rental units affordable to households making 50% to 60% of the area medium income, for ten years, they will receive 10-year eligibility for a reduced property tax class rate.

ACTIONS:

1. Advocate for the General Assembly to pass legislation that would establish a preferential assessment program for affordable housing in Georgia.

CONDITIONS FOR PROVIDING HOUSING REHABILITATION SERVICES

Rehabilitating NOAH properties is a way to stay redevelopment pressure and keep NOAH property owners who cannot reasonably afford or complete repairs on their own in their homes. Rehabilitation assistance can in turn be bargained for a right-of-first refusal or, if applied to a rental property, a continued affordable rental rate for an agreed-upon period.

A right of first refusal is a contractual right of a party to refuse or match an offer before another party has a right to engage in a transaction. For instance, if a home seller has granted a right of first refusal to a particular buyer, that buyer has a right to accept or reject the seller's offer before other prospective buyers can seek to purchase the home. It does not prevent other buyers from being able to purchase the property if the buyer with first refusal rights rejects the seller's offer. Right of first refusal in exchange for rehabilitation services or funding is a strategy that could be used by governmental or other housing organizations to increase opportunities to acquire NOAH properties.

The Decatur Home ReHAB program through the Decatur Land Trust already implements right of first refusal agreements on properties. In the event the property is sold in the future, the land trust would be in a privileged position to acquire the property. Besides the ReHAB program, right of first refusal can be used more widely, potentially as an agreement to loans and grants offered by through the Housing Trust Fund (HTF) for rehabilitation or other assistance, or as an agreement to receiving volunteer services through the MLK Service Project. The right of first refusal may be granted to the Decatur Land Trust, City of Decatur, the Decatur Housing Authority, DDA, or another entity.

Current rehabilitation programs in Decatur target homeowners, but if expanded to offer rehabilitation assistance to rental properties, contractual agreements could be supplied that require the property owner to maintain some commensurate level of affordability in the whole or a part of the property for a period of time. While impermanent, this strategy extends the lifespan of affordable units.

KEY ROLE(S):

- Decatur Land Trust, City of Decatur

CASE STUDIES:

1. The Detroit Preservation Action Plan highlights tying receipt of capital from a low-interest loan, grant, or other favorable financial incentive to an agreement to maintain affordability for current tenants or long-term affordability in the property.

ACTION(S):

1. Consider expanding the Decatur Home ReHAB program to offer rehabilitation assistance to renter-occupied homes. Stipulate a condition that the owner must maintain affordability at a certain level, term, or a combination of both in the property.
2. Consider expanding the Decatur Home ReHAB program to serve households that are not senior- or veteran-occupied homes if the NOAH property is deemed at risk for demolition.
3. Consider adding the stipulation that homeowners who receive assistance from the MLK Service Project must grant Decatur Land Trust, City of Decatur, the Community Center for South Decatur, DDA, or Decatur Housing Authority the right of first refusal to purchase the property.

HISTORIC TAX CREDITS FOR NOAH PROPERTIES

Historic tax credits (HTC's) are a financial incentive to preserve the architectural and historic integrity of a building during a rehabilitation process. There are two main types of HTC programs: state credits and federal credits.

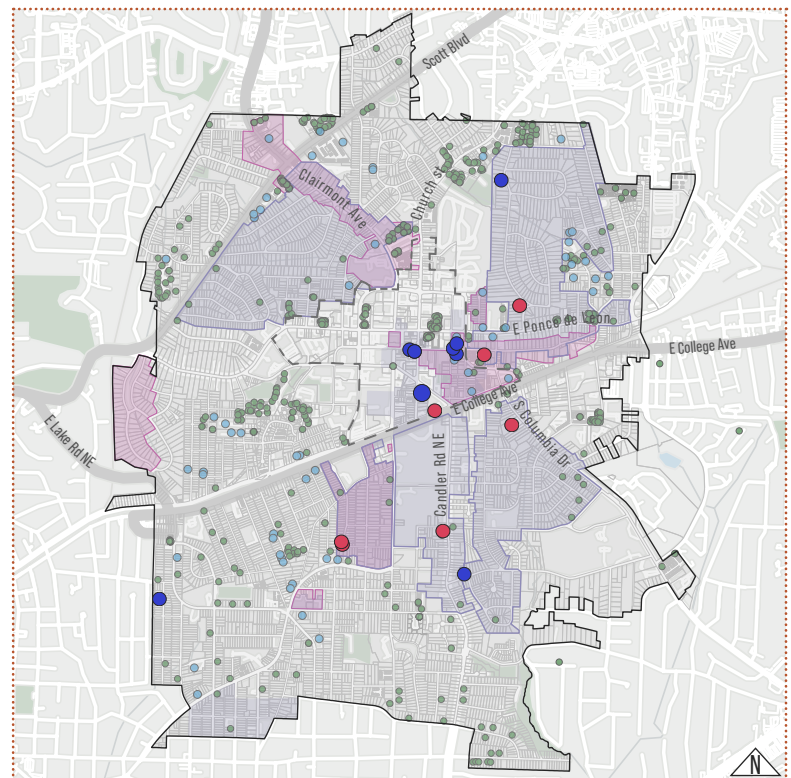
- The Georgia HTC Program, officially the “Georgia State Income Tax Credit Program for Rehabilitated Historic Property” offers a state income tax credit equaling **25% of qualifying rehabilitation expenses**. This program has a cap of \$100,000 for a principal residence, or \$5-10 million for all other properties.
- The Federal HTC program, officially the “Federal Rehabilitation Investment Tax Credit” program, offers a federal income tax credit equaling **20% of qualified rehabilitation expenses**. There is no maximum dollar limit to the federal HTC program.

Both programs are administered by the Georgia State Historic Preservation Office (SHPO). These programs may be used in tandem to maximize benefits. Properties must be listed, or eligible for listing, on any of the following: the national/Georgia Register of Historic Places, the National/Georgia Register Historic District, or a Decatur Local Historic District. Properties included in Decatur's local historic register must also coordinate with the city's historic preservation commission.

HTC's are available for all residential properties, regardless of tenure (owned or rented) and building size (single family to larger apartment buildings). Due to project costs and administrative hurdles, the most efficient application of HTC's for NOAH preservation goals is to medium to large multifamily buildings.

HTC's are credits on income taxes, not property taxes. Low to moderate income households seeking HTC's directly may not significantly benefit if their income taxes are moderate in comparison to the dollar value of tax credits available via either HTC program. This is less relevant if HTC's are used by a developer-investor to rehabilitate a larger, multi-unit rental property. In this case, the savings that the investor acquires can be passed on as cost-savings to rental tenants, for example.

Benefits are, furthermore, spread out up to 5 years, despite costs being incurred up front. This can present a significant hurdle to utilizing the program, particularly for low to moderate income households navigating the program on their own. Lastly,



HISTORIC TAX CREDIT UTILIZING PROPERTIES

Decatur Key Districts	Historic Tax Credit Properties	NOAH Property Types
 Local Historic Districts	 HTC, Primary Residences	 Rentals available at 80% AMI
 National Historic Districts	 HTC, Non-Primary Residences	 For Sale at 120% AMI
 Downtown DDA		

HISTORIC TAX CREDITS FOR NOAH PROPERTIES

applicants to the program typically utilize a consultant to help guide them through application and compliance requirements. A partial solution to overcoming the challenges of the application is to attempt to bundle properties under a single application process. A professional or organization with experience in using HTC's could also provide guidance to local property owners and local agencies seeking to use this incentive.

Decatur has both local and national historic districts within its boundaries, as well as a handful of buildings on the national and state registers of historic places. There are several properties within Decatur's borders that have received and utilized HTC's for rehabilitation purposes. Notably, Braden Fellman – who manages a significant share of NOAH rental properties in and around Decatur – has utilized HTC's for a variety of projects throughout the city of Atlanta and surrounding areas. There are a handful of smaller, boutique architecture and development firms working in and around Decatur who have utilized HTC's, as well as a smattering of individuals who own single-family homes in various historic districts in Decatur.

The map highlights the 16 properties that have utilized HTC in Decatur. Six of these properties were for primary residences of historic homes, with the remaining 10 properties utilizing HTC for non-primary residences. Note that there are a handful of properties outside of local and national districts who have utilized HTC's, as properties that are eligible to be listed on a historic register are able to apply.

KEY ROLE(S):

- Key NOAH rental property managers (such as Braden Feldman, who have used HTC's for rehabilitation), Decatur Historic Preservation Commission, technical assistance providers (such as Enterprise Community Partners)

CASE STUDIES:

1. Capitol View Apartments (Atlanta)

1. Utilized HTC's to partially fund renovation of the multifamily property.

ACTION(S):

1. Identify NOAH properties that are candidates for rehabilitation and which may receive HTC support.
2. Identify, and partner with, technical assistance providers (such as Enterprise Community Partners) to support applicants pursuing historic tax credits, with a focus on multifamily NOAH (both owned and rented).
3. Encourage Decatur's historic preservation commission to champion and promote HTC opportunities for NOAH preservation goals.

LOW-INCOME HOUSING TAX CREDITS FOR NOAH REHABILITATION

The Low-Income Housing Tax Credit (LIHTC) program supports subsidized rental housing units for low- and moderate-income households. The program can be used to assist acquisition, construction, and rehabilitation of affordable rental housing. It is enabled by a federal allocation of funds but is administered by the state (in Georgia, the Department of Community Affairs administers the program). There are two types of low-income housing tax credits available: 4% credits and 9% credits.

While both types of credits can be used for rehabilitation projects, the 4% credit is generally less competitive and applications are accepted on a rolling basis. 4% tax credits were used to partially finance the rehabilitation of the historic Capitol View apartments in Atlanta's Adair Park neighborhood. The rehabilitation effort received over \$12 million in equity investment in LIHTC credits, among other sources of capital.

Decatur may choose to explore the feasibility of using LIHTC to assist in funding the rehabilitation of NOAH properties. It is important to remember that the program can only be used for rental units, but there are several multifamily rental properties in the city that could be candidates for the program. If Decatur is interested in recruiting LIHTC assistance, the city should identify a developer with a proven track record LIHTC development and a quality affordable housing investor.

KEY ROLE(S):

- City of Decatur, affordable housing developer with LIHTC experience, LIHTC investor, Department of Community Affairs

CASE STUDIES:

1. Capitol View Apartments (Atlanta)

1. Utilized LIHTC (4%) to partially fund renovation of the multifamily property.

ACTION(S):

1. Identify multifamily rental properties that are candidates for rehabilitation.
2. Identify an affordable housing developer with a long track record of LIHTC experience willing to acquire and rehabilitate the property. Ideally, the developer would identify a responsible, quality investment partner.
3. Submit an application for LIHTC for rehabilitation of a NOAH property either as the principal source of funding for the project or to partially fund an effort.

VOLUNTEER PROGRAMS

Grassroots efforts and local fundraising can provide impactful rehabilitation support where formal services are insufficient. Decatur has supported a longtime volunteer program, the Martin Luther King Service Project (MLK Service Project), that has provided repair and rehabilitation services to veteran and senior homeowners in Decatur since 2003. The program boasts an impact of almost \$275,000 in completed repairs across 22 households annually. It is part of the Community Center for South Decatur (CCSD), a nonprofit organization, and operates in partnership with the City of Decatur.

The MLK Service Project deploys volunteers to senior and veteran-owned properties in the city in need of repairs annually, during the Martin Luther King Day weekend in January. It is made successful by grants, private donations (financial and in-kind), and volunteer labor. Given the program's achievements, the 2020 Decatur Housing Task Force Report suggested that it be expanded into a year-round service. This idea partly inspired the Decatur Home ReHab program through the Decatur Land Trust.

While the Decatur Home ReHab is now operational as an initiative of the land trust, the MLK Service Project continues to provide volunteer services annually and will likely remain an important stopgap to help senior and veteran homeowners in need of assistance. Therefore, Decatur and CCSD may choose to continue to cultivate support for the program by recruiting additional volunteers and boosting fundraising efforts. For example, CCSD might strengthen its fundraising efforts by tapping into crowdfunding platforms or, conversely, develop a fundraising strategy that is geared towards high-wealth prospective donors. Homeowners that received MLK Service Project assistance could also be asked to accept rehabilitation services under the condition that the land trust, the City of Decatur, or CCSD be granted right of first refusal for the property, that the structure remain occupied by the owner for a period of time, or that the cost of repair services be repaid if the property is sold within a short period (see Strategy: Right of First Refusal and Rental Rate Agreements).

Decatur may consider partnering with or inviting other nonprofits that provide home repair services to help in special cases or where the city's efforts are insufficient to meet existing need. Rebuilding Together Atlanta and Habitat for Humanity are two national organizations with chapters in Metro Atlanta who can complement the City's and land trust's rehabilitation programs.

KEY ROLE(S):

- Community Center for South Decatur, City of Decatur

ACTION(S):

1. Increase donations to MLK Service Project by developing a sophisticated fundraising strategy and employing new fundraising tactics like crowd-sourcing, targeted solicitations, or tabling at city events. The CCSD would likely act as the manager for fundraising activities for the MLK Service Project.
2. Partner with Rebuilding Together Atlanta, Habitat for Humanity, and other organizations that similarly offer home repair services to fulfill unmet home rehabilitation needs.

PARTNERSHIP WITH LAND BANKS

A land bank is a public entity with powers to acquire properties, clear title and taxes, and dispose of properties to be put back into productive use. Communities in Georgia have the power to establish a local land bank through an intergovernmental agreement between two governmental agencies, in many cases between a county government and a city within the county. The Dekalb Regional Land Bank Authority was reestablished in 2023 through an intergovernmental agreement between Dekalb County and the City of Lithonia. It can be instrumental in preservation of NOAH units or creation of additional affordable housing opportunities in several ways:

- **Donation Program:** The land bank can accept donations of real property, which can then be sold or transferred to a nonprofit organization that meets the land bank's mission, such as to the Decatur Land Trust. If an owner of a tax delinquent property wishes to donate their property to the Decatur Land Trust, then the land may pass through the land bank as an intermediary to clear taxes owed on the property before being transferred to the land trust.
- **Sale of Properties for Long-Term Affordable Housing:** The land bank may sell properties to any party that intends to utilize or improve the property in a way that meets the land bank's mission. The land bank may elect to sell a property to the Decatur Land Trust, Decatur Housing Authority, or another party for a fraction of fair market value to promote housing affordability. To use an example, the land bank may sell a single-family property to the Decatur Land Trust that the land trust will rehabilitate. The rehabilitated property will enter the land trust and be transferred to a new owner at an affordable price.
- **Title Clearance:** A core function of the land bank is clearing title on real property. NOAH properties that may be subject to multiple ownership claims or complicated ownership status could have their titles cleared more effectively if transferred or acquired by the land bank, who can then dispose of the property to a nonprofit for affordable housing purposes.

Though the land bank's other programs can support general housing affordability, these functions are ways in which land banks can help preserve NOAH. Typically, the land bank would acquire a NOAH property via donation or seizing it after it falls into tax foreclosure, therefore its influence would not apply to healthy NOAH properties. Even so, the Dekalb Regional Land Bank Authority first requires a license to operate in Decatur through an intergovernmental agreement. Decatur may consider entering into an agreement with the land bank to enable its activity in the city and facilitate partnerships with Decatur nonprofits, such as the Decatur Land Trust, and other organizations with affordable housing initiatives. Alternatively, if the Decatur Land Trust expands operations outside of the city, partnerships with the land bank would be possible in unincorporated areas in the vicinity of Decatur.

KEY ROLE(S):

- Dekalb Regional Land Bank Authority, City of Decatur

ACTION(S):

1. Consider entering into an intergovernmental agreement between the City of Decatur and the Dekalb Regional Land Bank Authority.
2. If the land bank is operational in Decatur, broker partnerships between the land bank and organizations with affordable housing initiatives working in Decatur to preserve and create affordable housing.

RETROFIT AND WEATHERIZATION

A key challenge for NOAH properties is how to maintain a decent and safe living standard while keeping monthly costs low. Significant repairs – such as roof or HVAC system replacement – can put severe financial strain on both homeowners and landlords alike. Furthermore, Georgia has one of the highest rates of energy burden in the nation, where low-income households pay out-sized percentages of their income on electric and gas bills. Weatherization programs thus address a double need of providing funds for property maintenance, which are more likely to be NOAH units if they are older and have deferred maintenance, and lowering energy cost burden.

The City of Decatur is launching Electrify Decatur to educate and assist residents in transitioning to electric systems and appliances. In addition, Decatur is working to access the Georgia Environmental Finance Authority (GEFA) Energy Rebate program on behalf of the city's low-income residents. This is a relatively new program, established by the American Rescue Plan Act (ARPA) in 2021. Decatur's [2023 Sustainability Report](#) includes tips for property owners to keep utility costs down.

Lastly, weatherization can be coupled with broader historic preservation efforts for a multiplier effect on funding and preservation goals. EarthCraft's Sustainable Preservation program (ECSP), for example, is a green building certification that complements the historic tax credit review process.

There are a myriad of programs available to both renters and homeowners, not limited to this partial list:

PRIVATE PROGRAMS

1. [Georgia Power EASE](#)

2. [Georgia Gas Light Rebate Programs](#)

3. [Fannie Mae Homestyle Energy Mortgage](#)

1. These loans are used during the purchase or refinancing of your home. Homestyle Energy Mortgage allows the borrower to make upgrades to conserve energy, cut down utility costs, or make their home more resilient. Borrowers can finance basic home weatherization, renewable energy implementations, and resiliency upgrades. _

4. [EarthCraft Certification Program](#)

1. Supports historic buildings renovation efforts to focus on health, resource efficiency, and high performance. This also gives bonus points on LIHTC rehabilitation applications. As such, the program could be a particularly good fit for multifamily buildings. _

NATIONAL PUBLIC PROGRAMS

5. [Low Income Home Energy Assistance Program \(LIHEAP\)](#)

1. A federal program administered locally via Partnership for Community Action, Inc. One of the program goals is to provide "Long-term, low-cost residential weatherization assistance."

RETROFIT AND WEATHERIZATION

6. [U.S. Department of Energy Weatherization Assistance Program \(WAP\)](#)

1. Administered locally by the [Georgia Environmental Finance Authority \(GEFA\)](#)

7. [Energy Efficiency Home Improvement Tax Credits](#)

1. Up to \$3,200 in tax credits can be claimed for home energy improvements made after January 2023. The credits can be claimed through 2032.

8. [Energy Efficiency and Conservation Block Grant](#)

1. Decatur can partner with multifamily NOAH owners to retrofit NOAH properties with this block grant program.

STATE PUBLIC PROGRAMS

9. [Georgia's Home Energy Rebates](#)

1. Includes home efficiency rebates (HER) and Home electrification and appliance rebates (HEAR) for both renters and homeowners.
2. [HEAR DIY](#)
 1. Up to 100% of total project cost will be covered for replacing kitchen gas-powered appliances with electric.

KEY ROLES:

- City of Decatur, Georgia Environmental Finance Authority (GEFA), Georgia Power, Southface

CASE STUDIES:

1. Lancaster County Whole Home Repairs Program:

1. The Lancaster County Whole Home Repairs Program assists qualified homeowners in Lancaster City and Lancaster County with needed home repairs to address issues such as safety, security, livability concerns, accessibility, and energy efficiency.

2. 4D Affordable Housing Incentive:

1. The 4D Affordable Housing Incentive aims to preserve affordability, reduce energy use, and foster healthy homes in Minneapolis.

ACTION(S):

1. Continue to work towards launching the Electrify Decatur program.
2. Maintain an up-to-date catalogue of programs and offerings for Decatur residents to refer to that can help address issues related to building maintenance and efficiency improvements.
3. Encourage utilization of weatherization programs, when appropriate, to property owners and developers who own and manage NOAH properties

ACCESSORY STRATEGIES

RENTAL PROPERTIES DATABASE

A rental registry acts as a repository to collect rental property data, such as property location and rental rates, especially for smaller rental properties that are often unrecorded in other databases. However, state legislation must be passed to enable local governments to set up a rental property registry. If it becomes an available option, a local rental property registry will help local governments keep track of rental properties, rental rates, and to prioritize NOAH preservation efforts. In the absence of an official registry, the Decatur Land Trust, the City of Decatur, or another organization should attempt to keep record of known affordable units and to update it periodically.

ZONING FOR NOAH PRESERVATION

Local governments may consider adopting a provision to prevent or deter redevelopment of NOAH properties that could be applied to the base zoning district or to a zoning overlay. Though this type of zoning restriction is largely untested, it is analogous to historic preservation districts, which limit the redevelopment potential of properties in the district and prioritize historical value over economic value. Another analogy to potential NOAH preservation zoning is the adoption by some local governments of a restriction to redevelopment of manufactured home parks, unless certain conditions are met, in order to protect tenants from displacement; communities that adopt such protections are essentially attempting to preserve the affordable housing constituted in the existing manufactured homes. Both historic preservation districts and zoning that provides protections for manufactured home communities are precedents that lend logical justification to potential NOAH preservation zoning.

A NOAH preservation overlay district or base zoning requirement could work in different ways. For example, it may limit building renovations through permit restrictions that permit new additions to a dollar value that is 10-20% of the fair market value. Or it may limit conversion of an affordable dwelling to a more intense development. The application of the zoning rule can be limited to certain areas based on the value of homes in the area compared to the average citywide value of homes or another metric that identifies and applies to those areas where concentrations of NOAH homes occur. It may also grant exceptions for developers or housing organizations that intend to redevelop properties to create an equal or greater amount of affordable housing units or provide deeper affordability. While zoning to preserve NOAH units or structures is feasible, it has not yet been widely tested.

DEMOLITION PERMIT RESTRICTIONS

Local governments may attempt to preserve NOAH units by changing the conditions under which a demolition permit is granted. Demolition permits may be withheld, for example, in a fixed area where NOAH units occur (through an overlay district) or throughout the jurisdiction based on the value of a home or structure compared to an average (as an underlying regulation). The local government may also choose to implement higher fees on demolition permits for NOAH homes or structures with NOAH units. Lastly, demolition permits may be granted given that the property owner demonstrates that the replacement units will be made as or more affordable than the original units.

ACCESSORY STRATEGIES

TRAININGS FOR OWNER ASSOCIATIONS

Condo Owners Associations (COA's) are charged with collecting and managing funds to oversee building maintenance and repairs. However, COA's may not be experienced in planning and stewarding funds to effectively guard against unforeseen expenses. Without a healthy reserve fund, unexpected costs can overwhelm the condominium association, and deferred action risks the building falling into disrepair.

In addition to inadequate reserve funds, COA's and their buildings can be compromised by issues like deferred maintenance, outdated policies and procedures, emergency repairs, and rising insurance premiums that stack up financial pressure. Rising insurance costs present an acute challenge for COA's in that they may lead to requiring fees that the COA cannot raise, and even to lenders refusing to back mortgages on individual units. Insurance costs are rising for these types of properties nationwide due to increased catastrophic damage, rising reinsurance costs, and an uptick in litigation against COA's. Even if COA's were willing to meet this cost by raising monthly fees, their bylaws may only approve incremental increases that would be insufficient to meet an immediate higher cost. Failure to acquire insurance, address important repairs, and other reasons may cause condominium properties to fall out of good standing with the Federal Housing Administration, which impacts buyers' ability to acquire FHA-backed mortgages for units in the property. Sharing this information through a city-backed or sponsored effort and educating COA's on the importance of reserve fund management, insurance issues, and best practices like regularly scheduled building inspections will make it less likely that COA's fall into financial hardship and help preserve the NOAH units in these properties.

Decatur may choose to contact NOAH condominium properties and recommend their management associations commission reserve fund training. The city could offer an incentive, such as additional merit on a loan or grant application through the Housing Trust Fund. Or, the City may contract with a professional and offer this service to targeted NOAH properties free of charge. Such an educational offering will be most effective if led by a professional familiar with the contemporary challenges confronting condominium properties.

INCLUSIONARY ZONING OPTION TO PRESERVE AFFORDABLE HOUSING UNITS

Developments subject to Decatur's inclusionary zoning policy have the option to contribute to the Housing Trust Fund (HTF) as an alternative to meeting the affordable unit requirements in the development. Another option may be given to allow developers to directly preserve or rehabilitate NOAH units. Though this effect is indirectly achieved by contributions to the HTF, which can fund preservation and rehabilitation, allowing developers to directly subsidize preservation or rehabilitation may be more effective in some cases.

RECOMMENDED CONTRACTORS LIST

A list of recommended contractors would be a useful resource for NOAH owners seeking rehabilitation assistance and for programs offering rehabilitation services. A list of trusted contractors simplifies the search process for rehabilitation services and ensure repairs are up to standards.

ACCESSORY STRATEGIES

SMALL LANDLORD ASSISTANCE

Landlords of small multifamily buildings may struggle to remain solvent. They may, for example, lack experience or lack awareness of best practices for property management and maintaining good tenant relations. Educational resources and trainings could fulfill the need to bolster small landlords' ability to sustain their rental operations. Some ways which this might happen is by connecting small landlords to a peer network and offering resources, short courses, or seminars on topics like "tenant-proofing" units (using more durable interior materials to potentially minimize repairs). Landlords may also be trained on management methods and assistance programs that can decrease or defer evictions. In Georgia, there are several utility assistance programs that offer to help low-income residents pay their utility bills or acquire a utility bill discount. Certain non-profit organizations in the Atlanta metro also provide short-term or emergency rental assistance for eviction prevention. Increasing knowledge about these resources so that it can be shared among landlords or to their tenants will strengthen housing stability and may keep small multifamily rentals in operation. An educational campaign or the creation of a peer network for small landlords could be sponsored by the City of Decatur.

Furthermore, some programs pair granting assistance with requirements to attend property management training (Washington DC's Small Building Program is an example). Such a condition could be a requirement to receiving grant or loan assistance for repairs disbursed from the HTF or from a rehabilitation program. The requirement could be applicable to landlords of small multifamily buildings being granted funding assistance.

ACTION(S):

1. Advocate at the state level for legislators to permit local governments to keep rental registries.

1. An amendment to overturn the ban on rental registries was proposed in HB 374 in the 2025-26 legislative session but did not pass. This effort may be renewed in future sessions.

2. Consider disincentivizing NOAH removal through policy procedures like restructured demolition fees and permitting.

3. Keep a recommended contractors list and utilize trusted contractors for structural rehabilitation programs.

4. Consult with condominium properties with NOAH units and identify at-risk properties. Consider funding a COA training for condominium properties or creating incentives for COAs to commission trainings and provide verification of completion.

5. Consider facilitating a small landlord peer exchange network or offering educational materials to landlords that may help sustain NOAH properties and reduce eviction rates.

6. Consider amending the inclusionary zoning policy to allow developers to opt to fund rehabilitation of NOAH units directly as an alternative to providing affordable units in a new development. This strategy will be improved if an up-to-date list of NOAH rehabilitation needs and projects can be supplied for a developer to fund.



Case Studies and Recommended Actions

C

ASE STUDIES AND RECOMMENDED ACTIONS

Case studies pave a path towards implementing similar strategies, either whole or in part, in a local context. These examples instrumentally informed about the strategies and funding mechanisms featured in this report. Though they come from different parts of the state and the country, they provide templates for NOAH preservation strategies in Decatur. In fact, Decatur already implements strategies akin to some of these examples, such as home rehabilitation and repair programs, incentives and support for energy retrofits, and more. Still, even these similar case studies may operate differently and thereby lend ideas for tweaking and improving existing Decatur programs, policies, and practices. Furthermore, some of these case study examples come from different legal contexts and cannot be completely emulated under prevailing state policies in Georgia. These examples give insight into what legislative changes can be advocated for in regard to creating and protecting affordable housing throughout the state.

A compiled recommended actions table follows the case study descriptions. The table is organized foremost by actions that can be accomplished in the relative short-term, followed by actions with longer time horizons and actions regarding state-level advocacy.



CASE STUDIES

4D AFFORDABLE HOUSING INCENTIVE (MINNEAPOLIS)

The 4D Affordable Housing Incentive aims to preserve affordability, reduce energy use, and foster healthy homes in Minneapolis. This incentive program is designed for owners of market-rate multifamily properties who meet certain criteria as outlined by the program. If property owners keep 20% or more of their rental units affordable to households making 50% to 60% of the area medium income, for ten years, they will receive 10-year eligibility for a reduced property tax class rate.

AFFORDABLE HOUSING PRESERVATION GRANTS (CAMBRIDGE, MA)

The Affordable Housing Preservation Grant can be used to restore exterior features that contribute to the original appearance of the building. Grants can also be used for structural repairs. Homeowners must meet eligibility requirements, and they must also qualify for affordable housing assistance as defined by the guidelines established by the Community Development Department.

AUGUSTA HOUSING REHABILITATION PROGRAMS (AUGUSTA, GA)

The goal of this program is to provide safe, sanitary, and affordable housing. Home improvements are made to meet safety codes, the Housing and Urban Development guidelines, and historic preservation requirements. This housing rehabilitation program is available to homeowners that live in Richmond County and qualify as low to moderate income. Financial assistance can be provided in the form of either a conditional deferred payment loan, a low-interest rate loan, or an emergency grant based on household income eligibility.

CAPITAL IMPROVEMENT AND PRESERVATION FUND (MASSACHUSETTS)

This is a state bond funded program that aims to preserve and improve existing privately owned, state or federally assisted affordably rental developments. Eligible properties are those that are at risk of losing their affordability restrictions. For-profit and non-profit developers in addition to local housing authorities are eligible to apply for funds that can be used towards items such as property acquisition or rehabilitation.

CAPITOL VIEW APARTMENTS RENOVATION (ATLANTA, GA)

Capitol View Apartments was a NOAH property in Adair Park at risk of being redeveloped due to gentrification in the neighborhood. Preservation and conversion of Capitol View to subsidized affordable housing was made possible through a public-private partnerships that included non-profits, the developer, state agencies, and Atlanta's economic development authority (Invest Atlanta). The renovation of the property was carried out in phases, with minimal displacement of residents, and was funded by bond issuance by Invest Atlanta, 4% LIHTC syndicated by Enterprise Community Partners, HTC's syndicated by Enterprise Community Partners, a HOME loan to support housing for the homeless and displaced in 20% of the renovated units, and a loan from the Georgia Housing and Finance Authority. The price structure of the renovated units serves households earning between 40% and 70% AMI.

CASE STUDIES

CHATTANOOGA PILOT FOR AFFORDABLE HOUSING (CHATTANOOGA, TN)

This is a tax incentive program designed to encourage mixed income and affordable unit rental development in Chattanooga. The Payment in Lieu of Taxes grants tax abatement to developers in exchange for providing affordable units. The program requires that the developer commits to a 15-year period during which the title of the property is transferred to the Health, Educational, and Housing Facility Board of the City of Chattanooga.¹

GREATER MINNESOTA NOAH IMPACT FUND (MINNESOTA)

In order to protect existing naturally occurring affordable housing in Minnesota, this Impact Fund was developed to finance the purchase and preservation of these units for the long term, and does so by providing equity investments to developers.

FLORIDA TAX EXEMPTIONS FOR AFFORDABLE HOUSING (FLORIDA)

As of July 2024, there are six different types of affordable housing- related property tax exemptions available in the state of Florida. Each program has different eligibility criteria and degrees of property tax exemptions available based on the number of units that are affordable to qualifying households.

HEALTHY HOUSING INITIATIVE (BIRMINGHAM, AL)

This Birmingham program provides housing rehabilitation, energy- related upgrades, and general improvements for low- income homeowners. These community focused efforts help to increase property values and create healthier and safer neighborhoods. Funding assistance is available to households that have proper insurance coverage and earn below 80% of area median income.

HISTORIC HOMEOWNER GRANT PROGRAM (WASHINGTON, DC)

This grant is available to low- and moderate-income households that own a qualifying building within DC's historic districts. This grant can be applied towards exterior and structural improvements, but to be eligible, the homeowner must meet specific criteria such as owning a house in a historic district and having an income of less than 120% of the area median income. Grants are also given based on the project priority, which is measured by its benefit to historic preservation and their community.

HISTORIC PRESERVATION DEMONSTRATION PROJECT (PHOENIX, AZ)

The City of Phoenix has numerous programs and incentives to encourage the preservation of its historic resources and foster redevelopment. One example is the Demonstration Project Program that rehabilitates important historic properties for used for multifamily, commercial, or institutional purposes.

¹ Tennessee imposes effectively similar restrictions on local governments to offer direct tax abatements as Georgia. Therefore, this program provides a model for how to stand up a PILOT program for affordable housing in a similar state legislative environment.

CASE STUDIES

HOME REHABILITATION PROGRAM (FULTON COUNTY, GA)¹

The Fulton County Home Rehabilitation Program provides funding to single-family homeowners in the City of Atlanta, Fulton County, and cities within unincorporated Fulton County. Funding assistance is based on income qualifications and can be used to repair and improve health and safety hazards.

ILLINOIS PREFERENTIAL ASSESSMENT FOR AFFORDABLE HOUSING (ILLINOIS)

This program provides and preserves affordable rental homes across the state of Illinois. Qualifying properties must be multi-family containing a minimum of 7 rental units. To be eligible for the assessment program these properties must allocate as least 15% of the units to be affordable for low- income households for a period of 10 years.

LEADSAFE PROGRAM (CHARLOTTE, NC)

LeadSafe Charlotte provides funding through grants to low- income homeowners to help in addressing unsafe lead paint conditions that pose a potential health hazard. This program assists owners of single and multifamily homes in addition to investor owners of properties with 2 or more bedrooms. Eligible applicants must meet certain criteria such as owning a home built before 1978 and must earn less than 80% of the area median income.

LOW INCOME HISTORIC HOUSING PRESERVATION PROGRAM (PHOENIX, AZ)

This program is designed to encourage the repair and rehabilitation of historic residential properties that provide housing options for low- income households. Funds can be applied towards important building maintenance, structural stabilization work, and the repair of exterior features. Projects need to meet the city historic preservation guidelines and eligible applicants need to meet the program criteria, including earning less than 80% of the area median income.

MARIETTA HOUSING REHABILITATION PROGRAMS (MARIETTA, GA)

Marietta offers three housing rehabilitation loan or grant opportunities. The grant program offers rehabilitation assistance for extremely low- income, low- income, elderly, and disabled households so that they can address imminent health or safety threats, maintenance problems, or code violations in their homes. The homeowners must have lived in the house for a minimum of 3 years and are eligible to receive a one-time grant of up to \$15,000. A 20-year forgivable loan program is offered to low- to moderate-income households. The loan is a zero-interest, deferred payment loan requiring no repayment while the home is occupied by the eligible homeowner and is secured by a lien on the property. A five-year forgivable loan that can be applied to costs related to inspection, testing, assessment, and abatement of lead and asbestos is also offered.

¹ The Fulton County Home Rehabilitation Program waitlist was put on pause in 2024. To better serve the homes awarded rehabilitation services, the program closed the waitlist to new waitlist applicants. Demand for the program far exceeds available services and funding.

CASE STUDIES

MIAMI-DADE HOUSING PRESERVATION THROUGH NOAH PROGRAM (MIAMI-DADE COUNTY, FL)

This program is a partnership between Miami-Dade County and the Dade Heritage Trust. The Dade Heritage Trust purchases, historically designates, and restores architecturally significant buildings and transforms them into affordable and livable multi-family residences.

MINNEAPOLIS HOUSING IMPROVEMENT AREA POLICY (MINNEAPOLIS, MN)

In Minnesota, cities may establish Housing Improvement Areas (HIAs) in which the city, its economic development authority, or its housing redevelopment authority can give loans to condominium, townhome, or manufactured home properties. Minneapolis will consider establishing an HIA as a last resort to Homeowners' Associations for loans to fund improvements to shared parts of the property. The loan may be provided for by city funds or by selling taxable bonds.

MULTI-FAMILY TIF PURCHASE-REHAB PROGRAM (CHICAGO, IL)

This program helps private developers purchase and rehabilitate vacant or underutilized buildings within designated Tax Increment Financing (TIF) districts. Up to 50% of total project funds may be from the TIF, offered as a forgivable loan. Eligible projects must require substantial rehabilitation of \$10,000/unit or more. If funding assistance is received, a percentage of units in the building proportional to the percentage of assistance funding to the total project cost must be maintained as affordable to households earning 80% AMI or below for a period of 10 years.

PORTLAND HOUSING BUREAU HOME REPAIR LOAN PROGRAM (PORTLAND, OR)

This program utilizes Tax Increment Financing (TIF) funds to offer no-interest loans for low-to-moderate income homeowners residing in designated TIF districts to make repairs and rehabilitations to their homes. Eligible repairs include repairs to come into code compliance, utility failures, and damaged or failing building components. Households making up to 120% AMI are eligible. Furthermore, a minimum of 30% of all TIF funds in Portland must be dedicated to the development, preservation, and/or rehabilitation of housing intended for households below 80% AMI.

RENO HOUSING AUTHORITY PROPERTY ACQUISITION (RENO, NV)

The Reno Housing Authority has incorporated property acquisition as part of their operations since the 1990's. The Authority began purchasing property to serve individuals who could not qualify for income-limited housing programs but who still needed assistance. Initially focusing on purchasing multifamily complexes, they have since added studio apartments, mobile homes, duplexes, and single-family homes to their portfolio throughout the city.

CASE STUDIES

RESTORATION TAX ABATEMENTS (LOUISIANA)

The Restoration Tax Abatement (RTA) program provides an up-to ten-year abatement of property taxes (ad valorem) on renovations and improvements of existing commercial structures and owner-occupied residences located within qualified areas. Qualified geographic areas include Downtown Development Districts, Opportunity Zones, Historic Districts, and Economic Development Districts (not Enterprise Zones and Economic Development Zones).

SAFE HOME EMERGENCY REPAIR (CHARLOTTE, NC)

This program helps with addressing immediate and emergency repairs so that the homeowner can continue to reside there. Funding is available for single- family housing and is provided in the form of a grant to the homeowner, and no liens or deed restrictions are placed on the property.

SMALL BUILDING PROGRAM (WASHINGTON, DC)

The Small Building Program, part of Washington DC's Department of Housing and Community Development, is a funding source available to affordable housing property owners. Eligible properties must have between 5 to 20 units and the repairs need to address issues concerning safety and environmental hazards.

VACANT SITE ACQUISITION FUND (BOSTON, MA)

The Vacant Site Acquisition Fund is available to qualified nonprofit affordable housing development partners. These funds can be used to purchase vacant and underutilized parcels of land and buildings for future development into mixed-income and affordable housing.

WASHINGTON PARK HOUSING PRESERVATION (ATLANTA, GA)

Between 2018-2020 the Atlanta Land Trust and the Georgia Trust for Historic Preservation partnered to preserve two historic homes in the Washington Park neighborhood and sell them at a price affordable to 80% AMI. The properties were renovated by the Georgia Trust through their Endangered Properties Revolving Loan Fund program, with additional funding assistance for the renovations came through a loan from a private foundation (1772 Foundation). Once renovated, the homes entered the Atlanta Land Trust's portfolio, capping their future sale price increase to a fraction of the homes' appreciated value.

WHOLE HOME REPAIRS PROGRAM (LANCASTER COUNTY, PA)

The Lancaster County Whole Home Repairs Program assists qualified homeowners in Lancaster City and Lancaster County with needed home repairs to address issues such as safety, security, livability concerns, accessibility, and energy efficiency. The Pennsylvania Department of Community and Economic Development sponsors this program using funds provided by the American Rescue Plan Act. Lancaster City residents are eligible to receive up to \$25,000 in grant assistance. Residents outside of the city are eligible for \$25,000 in deferred payment, zero-interest loans.

RECOMMENDED ACTIONS TABLE

COMPILED RECOMMENDED ACTIONS			
Action	Type	Category	Special Designation
Continue the annual allocation to the Housing Trust Fund at the current level or above. Consider if higher levels of funding can be allocated annually.	Funding Mechanisms	Housing Trust Funds	Short-Term Action Plan
Consider revising applicant eligibility for the HTF to allow individuals, HOAs and POAs, and multifamily rental owners to apply for assistance, or to apply for assistance in partnership with non-profits.	Funding Mechanisms	Housing Trust Funds	Short-Term Action Plan
Report regularly (annually or biannually) on the impact of the HTF.	Funding Mechanisms	Housing Trust Funds	Short-Term Action Plan
Consider revising the policies and procedures of the HTF to require a level of match funding for any disbursements, or create programs that operate using funds from the HTF that require match funding.	Funding Mechanisms	Housing Trust Funds	Short-Term Action Plan
Determine loan terms and repayment conditions for loans disbursed from the HTF.	Funding Mechanisms	Housing Trust Funds	Short-Term Action Plan
Discuss possibilities for future CDBG grant applications with DeKalb county to fund housing rehabilitation efforts in Decatur and to supplement the Housing Trust Fund. Ensure that programs and initiatives through CDBG in Decatur do not conflict with DeKalb programs.	Funding Mechanisms	External Funding Opportunities	Short-Term Action Plan
Consider issuing general obligation bonds or housing bonds to fund NOAH rehabilitation efforts or to increase the Housing Trust Fund.	Funding Mechanisms	Accessory Funding Mechanisms	Short-Term Action Plan

RECOMMENDED ACTIONS TABLE

Being to offer competitive grants and loans from the HTF to NOAH properties that may apply for funding.	Strategies for NOAH Preservation	Loan and Grant Programs and Revolving Loan Funding	Short-Term Action Plan
Consider expanding the Decatur Home ReHab program to offer rehabilitation assistance to renter-occupied homes. Stipulate a condition that the owner must maintain affordability at a certain level, term, or a combination of both in the property.	Strategies for NOAH Preservation	Conditions for Providing Housing Rehabilitation Services	Short-Term Action Plan
Consider expanding the Decatur Home ReHab program to serve households that are not senior- or veteran-occupied homes if the NOAH property is deemed at risk for demolition.	Strategies for NOAH Preservation	Conditions for Providing Housing Rehabilitation Services	Short-Term Action Plan
Consider adding the stipulation that homeowners who receive assistance from the MLK Service Project must grant Decatur Land Trust, City of Decatur, the Community Center for South Decatur, DDA, or Decatur Housing Authority the right of first refusal to purchase the property.	Strategies for NOAH Preservation	Conditions for Providing Housing Rehabilitation Services	Short-Term Action Plan
Identify NOAH properties that are candidates for rehabilitation and which may receive HTC support.	Strategies for NOAH Preservation	Historic Tax Credits for NOAH Properties	Short-Term Action Plan
Encourage Decatur's historic preservation commission to champion and promote HTC opportunities for NOAH preservation goals.	Strategies for NOAH Preservation	Historic Tax Credits for NOAH Properties	Short-Term Action Plan
Identify multifamily rental properties that are candidates for rehabilitation.	Strategies for NOAH Preservation	Low-Income Housing Tax Credit for NOAH Rehabilitation	Short-Term Action Plan
Consider entering into an intergovernmental agreement between the City of Decatur and the Dekalb Regional Land Bank Authority.	Strategies for NOAH Preservation	Partnership with Land Banks	Short-Term Action Plan
Continue to work towards launching the Electrify Decatur program.	Strategies for NOAH Preservation	Retrofit and Weatherization	Short-Term Action Plan

RECOMMENDED ACTIONS TABLE

Maintain an up-to-date catalogue of programs and offerings for Decatur residents to refer to that can help address issues related to building maintenance and efficiency improvements.	Strategies for NOAH Preservation	Retrofit and Weatherization	Short-Term Action Plan
Keep a recommended contractors list and utilize trusted contractors for structural rehabilitation programs.	Strategies for NOAH Preservation	Accessory Strategies	Short-Term Action Plan
Consult with COA's of properties with NOAH units and identify at-risk properties. Consider funding a COA training for condominium properties or creating incentives for COAs to commission trainings and provide verification of completion.	Strategies for NOAH Preservation	Accessory Strategies	Short-Term Action Plan
Advocate for legislation to create a dedicated source of revenue for Georgia's state Housing Trust Fund, which currently relies on annual appropriations, to increase the fund. Simultaneously, advocate to expand use of the funds to support a wider range of housing-supportive activities, and for these funds to be distributed to counties and municipalities on some qualifying basis.	Funding Mechanisms	Housing Trust Funds	State Level Advocacy
Advocate for the Georgia General Assembly to allow local governments to opt to use some new or additional local funding sources as dedicated revenue for local Housing Trust Funds.	Funding Mechanisms	Housing Trust Funds	State Level Advocacy
Advocate for the General Assembly to pass legislation that would allow local governments to offer tax abatements outright to residential property owners leasing affordable units.	Strategies for NOAH Preservation	PILOT Programs and Tax Abatements	State Level Advocacy

RECOMMENDED ACTIONS TABLE

Advocate for the General Assembly to pass legislation that would establish a preferential assessment program for affordable housing in Georgia.	Strategies for NOAH Preservation	Preferential Assessment for Affordable Housing	State Level Advocacy
Advocate at the state level for legislators to permit local governments to keep rental registries.	Strategies for NOAH Preservation	Accessory Strategies	State Level Advocacy
Consider levying or increasing fees or taxes under local government control to contribute to augment the general fund. This would in turn enable greater annual contributions to the HTF.	Funding Mechanisms	Housing Trust Funds	
Use the HTF to leverage additional private and philanthropic investments.	Funding Mechanisms	Housing Trust Funds	
Identify opportunities to apply for CHIP funds, with eligible applicants including the City, Decatur Housing Authority, or Decatur Land Trust to support the Decatur ReHab program.	Funding Mechanisms	External Funding Opportunities	
Consider working with an internal or contract grant specialist to identify and apply to private grant opportunities.	Funding Mechanisms	External Funding Opportunities	
Identify residential properties of historic significance requiring renovations. Contact the Georgia Trust for Historic Preservation to see if they would be willing to acquire properties, or to jointly identify properties of interest. Gauge feasibility of structuring a process facilitating renovation and transfer to the Decatur Land Trust.	Funding Mechanisms	External Funding Opportunities - Historic Preservation	
Consider expanding the existing TAD boundaries to encompass NOAH properties, especially multifamily properties whose rehabilitation needs may meet or exceed the \$7.5 million project size minimum.	Funding Mechanisms	Tax Allocation Districts	

RECOMMENDED ACTIONS TABLE

Consider creating a new TAD that encompasses NOAH properties and that could facilitate funds to those properties for rehabilitation and preservation.	Funding Mechanisms	Tax Allocation Districts	
Explore opportunities to use New Market Tax Credit financing in Decatur for multifamily rehabilitation in developments that have the requisite commercial component.	Funding Mechanisms	Accessory Funding Mechanisms	
Foster public-private partnerships to secure diverse financing for affordable housing initiatives, including rehabilitation.	Funding Mechanisms	Accessory Funding Mechanisms	
Explore the opportunity to levy linkage fees on non-residential developments.	Funding Mechanisms	Accessory Funding Mechanisms	
Capitalize a revolving loan fund that will be self-replenishing, providing a source for loans into the future. Note that seed funding for a revolving loan fund may come from the Housing Trust Fund and/or other funding sources. Grants like Community Development Block Grants are common sources for the capitalization of revolving loan funds.	Strategies for NOAH Preservation	Loan and Grant Programs and Revolving Loan Funding	
Provide mutual, inter-agency support to acquire NOAH properties threatened by redevelopment.	Strategies for NOAH Preservation	Acquisition and Management of Existing NOAH Properties	
Create a process whereby property owners can apply for tax abatements through a PILOT program. A PILOT program for affordable housing would need to operate similarly to the Chattanooga PILOT program in that title should be held by a downtown development authority or other governmental tax-exempt organization.	Strategies for NOAH Preservation	PILOT Programs and Tax Abatements	

RECOMMENDED ACTIONS TABLE

Create a process whereby multiple NOAH properties can be bundled together under one bond-for-title transaction to limit associated title transfer and other fees. The title should be held by a downtown development authority or other public agency.	Strategies for NOAH Preservation	PILOT Programs and Tax Abatements	
Explore the possibility for other public agencies, such as housing authorities, to hold title to property providing affordable units in exchange for reduced payments.	Strategies for NOAH Preservation	PILOT Programs and Tax Abatements	
Identify, and partner with, technical assistance providers (such as Enterprise Community Partners) to support applicants pursuing historic tax credits, with a focus on multifamily NOAH (both owned and rented).	Strategies for NOAH Preservation	Historic Tax Credits for NOAH Properties	
Identify an affordable housing developer with a long track record of LIHTC experience willing to acquire and rehabilitate the property. Ideally, the developer would identify a responsible, quality investment partner.	Strategies for NOAH Preservation	Low-Income Housing Tax Credit for NOAH Rehabilitation	
Submit an application for LIHTC for rehabilitation of a NOAH property either as the principal source of funding for the project or to partially fund an effort.	Strategies for NOAH Preservation	Low-Income Housing Tax Credit for NOAH Rehabilitation	
Increase donations to MLK Service Project by developing a sophisticated fundraising strategy and employing new fundraising tactics like crowdsourcing, targeted solicitations, or tabling at city events. The CCSD would likely act as the manager for fundraising activities for the MLK Service Project.	Strategies for NOAH Preservation	Volunteer Programs	

RECOMMENDED ACTIONS TABLE

Partner with Rebuilding Together Atlanta, Habitat for Humanity, and other organizations that similarly offer home repair services to fulfill unmet home rehabilitation needs.	Strategies for NOAH Preservation	Volunteer Programs	
If the land bank is operational in Decatur, broker partnerships between the land bank and organizations with affordable housing initiatives working in Decatur to preserve and create affordable housing.	Strategies for NOAH Preservation	Partnership with Land Banks	
Encourage utilization of weatherization programs, when appropriate, to property owners and developers who own and manage NOAH properties	Strategies for NOAH Preservation	Retrofit and Weatherization	
Consider disincentivizing NOAH removal through policy procedures like restructured demolition fees and permitting.	Strategies for NOAH Preservation	Accessory Strategies	
Consider facilitating a small landlord peer exchange network or offering educational materials to landlords that may help sustain NOAH properties and reduce eviction rates.	Strategies for NOAH Preservation	Accessory Strategies	
Consider amending the inclusionary zoning policy to allow developers to opt to fund rehabilitation of NOAH units directly as an alternative to providing affordable units in a new development. This strategy will be improved if an up-to-date list of NOAH rehabilitation needs and projects can be supplied for a developer to fund.	Strategies for NOAH Preservation	Accessory Strategies	

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