

Lower Hill PLDP Review Committee Sign-on Letter to City Planning

Mr. Ray Gastil
Acting Planning Director
Pittsburgh Department of City Planning
200 Ross Street, 4th Floor
Pittsburgh, PA 15219

Re: Lower Hill Specially Planned District

Dear Mr. Gastil,

The undersigned Hill District community organizations ask that the Department of City Planning (DCP) join us in requesting the Pittsburgh Penguins to conduct a fair housing market study to determine the likely racial composition of housing in the redeveloped Lower Hill District under their proposed development plan.

As you know, the Penguins have prepared a request to designate the Lower Hill as a Specially Planned District, and have drafted a proposed Preliminary Land Development Plan (PLDP) for the Lower Hill. The draft PLDP proposes nearly 1200 units of new housing in the Lower Hill. The Greater Hill District Master Plan calls for making at least 30% of this housing affordable to households earning at or below 50% of the area median income (AMI), with deeper income targeting if a public subsidy is available. These levels are designed to ensure economic and racial diversity in a redeveloped Lower Hill District. The Penguins have stated that they do not intend to follow this provision of the Master Plan, and instead have offered to use “reasonable, good faith efforts” to make 20% of their units affordable to households earning 80% of AMI.

We are concerned that the Penguins’ proposed housing prices will effectively exclude the vast majority of African-American households in Pittsburgh from living in a redeveloped Lower Hill District. A market analysis prepared for the Penguins by AECOM in February, 2010, assumed that only persons earning at least \$52,000 per year would rent or purchase housing in the Lower Hill. Only 20% of African-American households in Pittsburgh earn that much. Even if the Penguins keep their pledge to make some of their units affordable to households earning 80% of AMI, the income that would be needed to afford a one-bedroom apartment at that level (\$39,100) is nearly two times the median income for all African-American households in the City of Pittsburgh (\$20,946).

The City has an affirmative duty as a recipient of community development block grant funds to provide opportunities for inclusive patterns of housing occupancy regardless of race, and that duty applies to the City's review of the Penguins' draft PLDP. In order to approve the PLDP, the Planning Commission would have to find, among other things, that the proposed district will create a favorable social impact on the City. Social impact must be considered in light of the City's duty to affirmatively further fair housing choice, and a finding of favorable social impact should only be made if it is determined that the Penguins' development plans will not perpetuate racial segregation.

The most effective way to determine whether the Penguins' development plans will perpetuate racial segregation or foster racial inclusion is by conducting a fair housing market study. Such a study should use the same assumptions as the AECOM study (minimum income, geographic source, capture rates, etc.), but be specific to non-white households. On August 20, 2013, a committee of neighborhood stakeholders convened by the Hill CDC asked the Penguins to conduct a study to evaluate the effect of their proposed development on restoring opportunities for residential integration and economic inclusion of African-Americans in the Lower Hill, and that request was refused.

For these reasons, the undersigned organizations ask that DCP join us in requesting that the Penguins conduct a market study to determine the likely racial composition of the Lower Hill at the housing prices that are provided (or allowed) in the draft PLDP.

Sincerely,

Name:

Organization:

Date:

Name:

Organization:

Date:

Name:

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