



Urban Townships Housing Needs Assessment



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Urban Townships Housing Needs Assessment

Introduction

This document provides a Housing Needs Assessment for the urban townships of Richland County.¹ The Housing Needs Assessment reviews information presented in other portions of the *Richland County Housing Needs Assessment and Action Plan*, as well as presenting analysis unique to urban townships regarding its housing market, land uses, zoning, and site suitability. The report concludes by identifying recommendations to strengthen urban townships housing market and encourage development of affordable, attainable, and market-rate housing.

Throughout the broader *Richland County Housing Needs Assessment*, we have divided the housing market into three tiers: affordable, attainable, and market-rate.

- **Market-rate housing** comprises housing for households earning above 120 percent of area median income, or over \$62,280 for a single-person household or \$88,920 for a family of four. Households in this income category are seeking a higher-end housing product with amenities like more square footage, a larger yard, pool, finished basement, or other comforts. For Richland County, we define market-rate homeownership as homes selling for over \$200,000. For market-rate rental housing, we define it as rental properties with rents that exceed \$1.00 per square foot.
- **Attainable housing** comprises housing for households earning between 80–120 percent of Area Median Income. Per HUD’s 2022 income limits, this comprises single person households earning between \$41,550–\$62,280 a year and four-person households earning between \$59,300–\$88,920 a year. Households in this income category earn too much to qualify for federal rental assistance, and they are often in the market for ‘starter’ or entry-level homes. For Richland County, we define ‘attainable’ homeownership as houses in good condition that are available for \$100,000-\$200,000, and attainable rental housing as unsubsidized units that rent for between \$0.70 and \$0.99 per square foot.

¹ The urban townships include Madison, Mifflin, Springfield, and Washington.

- **Affordable housing** comprises housing for households earning below 80 percent of the Area Media Income (AMI). For 2022, this amount is \$41,550 for a single-person household and \$59,300 for a family of four in Richland County. While not all households earning below those amounts reside in subsidized housing—in fact, the vast majority do not—80% AMI is typically the limit for most subsidized housing programs. For this study, we define affordable homeownership as houses in good condition that are available for under \$100,000, and affordable rental housing as either subsidized rentals or any unit that rents for under \$450 per month.

We have created a Richland County Housing Needs Assessment map [at this link](#). All of the mapped data collected through this project will be mapped at that link. We have created a short 'how to' video of how to use the map [here](#).

Housing Data Review

This first section reviews key data points related to the housing market of Richland County's urban townships. It first summarizes the node's demographic data before discussing housing tenure, cost burdens, and the node's affordable housing inventory.

Demographics. Compared to Richland County as a whole, the urban townships' population is slightly more likely to identify as non-Hispanic White (90% vs. 85% of the county's population). While relatively a small proportion of the node's overall population, the urban townships have the second-largest proportion of non-Hispanic Blacks in Richland County (4%; Mansfield has the largest at 20%). In terms of educational attainment, the population of the urban townships closely matches Richland County's population, with about half of all residents having attended at least some college while about 43 percent have a high school diploma as their terminal degree.

In terms of age distribution, the urban townships' population also closely resembles that of Richland County as a whole. Approximately 20 percent of the population is over the age of 65, about 25 percent of the population is under the age of 20, and a little over half the population is between the ages of 20–65. Within that last category, about 14 percent of the population is 'near elderly'—meaning they are within the ages of 55–64.

For special housing populations, the urban townships' poverty rate of 11 percent is slightly below the county's poverty rate of 14 percent, there are no tracts of concentrated poverty in the urban townships. However, 17 percent of the urban townships' population has at least one disability; this is the second-highest proportion of any node in the county (behind Mansfield at 21%). The most common disabilities among residents in the urban townships include ambulatory (8% of the population), cognitive (6%), hearing (5%), and independent living (5% of the population).

Housing tenure and demographics. Per the most recent U.S. Census, about 75 percent of housing units in the urban townships are owned while another 25 percent are rented. This means that the urban townships' homeownership rate is somewhat higher than the county's overall homeownership rate (which is 67%). Postal service vacancy data indicates that a little less than 3 percent of residential units in urban townships. This figure represents a modest decline in the urban townships' vacancy rate since 2012, when it was 3.4 percent.

Compared to the county as a whole, homeowners in the urban townships are somewhat more likely to be older and younger, and fewer are middle-aged. To that end, over a third (37%) of homeowners in the urban townships are over the age of 65, while exactly 10 percent are under the age of 35. In terms of renters, the urban townships have the highest proportion of young renters (those under age 35) in the county, at 41 percent off all renters.

Housing cost burden. Forty-two percent of renters in the urban townships are cost-burdened, meaning they pay over 30 percent of their income toward housing costs (including rent and utilities). This figure is the third highest among the nodes, behind only Mansfield and Shelby. Among all renters in the urban townships, 16 percent are severely cost-burdened, meaning they pay over 50 percent of their income toward housing costs. While the rate of severely cost-burdened renters is lower in the urban townships compared to many of the other nodes in Richland County, it still constitutes a substantial portion (468 households) of the node's renter population.

In addition, 23 percent of the urban townships' homeowners are cost-burdened, meaning they pay over 30 percent of their income toward mortgages and other housing costs. This figure is the second highest among the nodes in the county (behind only Mansfield), suggesting the need for outreach to the node's homeowner population.

Housing inventory. Among all housing units in the urban townships, 77 percent are single-unit detached homes, which is comparable to the overall rate of single-unit detached homes in the county (73%). Noteworthy among the urban townships' housing stock is that they contain the most mobile homes in the county (both in terms of absolute number and proportion of all homes), at 775 units comprising 6 percent of the housing stock.

The Census also tracks several indicators of substandard housing. In general, very few housing units in the urban townships report to have these issues, but the rate of overcrowding (more than one person per room) in the urban townships is the second highest among all the nodes at 1.5 percent of all housing units (behind only Mansfield).

Affordable housing inventory. We have mapped affordable housing developments across Richland County at [this link](#). As of Summer 2022, there are only 22 units of subsidized housing

in the urban townships; 18 units at Madison Terrace and four units at the Altman Heights quadruplex. Given the substantial number of households with a rent burden in the urban townships, this indicates a substantial need for subsidized housing in the node. Given the relatively high number of persons in the urban townships with a disability, the county may consider approaching a developer to utilize HUD's Section 811 program (which provides subsidized housing and services to those with a disability).

Metro Housing has issued approximately 1,900 Housing Choice Vouchers (HCV) to tenants in Richland County, and we have mapped the location of those voucher holders at the Census tract level [at this link](#). These data are at the Census tract level, so we are unable to directly identify how many HCV households reside in the urban townships specifically. However, in two Census tracts that almost exclusively overlap with the urban townships (tract 23, which is mostly Springfield Township, and tract 9 which is mostly Madison Township), there are approximately 40 HCV households in each tract. In other tracts that largely overlap with the urban townships, there are only a handful of voucher holders (typically less than 10 per tract).

Summing it up. Overall, the urban townships' current housing and demographic conditions suggest a housing inventory heavily oriented toward single-family homes occupied by both younger and older adults with relatively few middle-aged adults relative to the other parts of the county. The node also has a sizeable proportion of persons with a disability, and many of the disabilities that residents report requires a unique housing accommodation (e.g., ambulatory disabilities may make going up and down stairs difficult).

In terms of the node's housing inventory, while the vast majority of housing units are single-family detached, the urban townships also have a large number of mobile homes. Given current development pressures in the mobile home market, the node may see mobile home parks purchased in the coming years and redeveloped as other types of housing, thus leading to the displacement of existing residents.

Nearly half of all renters in the urban townships are cost-burdened, meaning they pay over 30 percent of their income toward rent. Yet, there are only 22 units of subsidized housing in the urban townships. This suggests the need for additional affordable housing development, possibly by using HUD's Section 811 program for those with disabilities or by project-basing vouchers into existing.

Housing Market Analysis

This next section provides an overview of the urban township's housing market. It first reviews residential permitting in the node over the past twenty years before reviewing home sales in the node over the last 10 years.

Permitting data

We have visualized single-family, 2- to 4-unit, and multifamily (4+ unit) permits [at this link](#) for all of the nodes in Richland County and have mapped permits on the Housing Needs Assessment online map ([link here](#)). Among all the nodes, the urban townships have seen the second-highest rates of permitting over the period tracked by the data (since 2002), behind only the rural townships. Of all permits filed in the node over that period, virtually all (462 out of 469) have been for single-unit dwellings. The rural and urban townships are, for the most part, the only nodes that have experienced substantial home construction activity over this period.

In the last 10 years (2013 and beyond), 145 residential permits have been filed in the urban townships. Of those, all for single-family dwelling units, with the exception of one permit filed in 2020 for a two-unit dwelling. Within those 10 years, the number of permits filed in each of the urban townships is the following:

- Madison – 23
- Mifflin -30
- Springfield - 48
- Washington -44

Sales data

We have created a data visualization of home sales by quarter in the urban townships going back to January 2012 [at this link](#). Broadly, sales trends in the urban townships mimic many of the other nodes in the county (with the exception of Mansfield and Shelby), as homes have appreciated out of the 'affordable' tier (selling for under \$100,000) and into the attainable (\$100,000–\$200,000) and increasingly the market rate (\$200,000+) tiers. More specifically, we identify the following trends for home sales in the urban townships.

First, the number of home sales overall has increased dramatically in the urban townships since late 2020. Prior to the third quarter of 2020, there were no quarters in which over 100 homes sold in the urban townships. However, since then, there have been four quarters that eclipsed that mark, and one quarter that was only slightly below 100 sales. This suggests that demand for housing in the urban townships has increased over time, perhaps from buyers who have been priced out of other nodes in the county.

Second, while the number of affordable houses in the node (those priced under \$100,000) has remained relatively the same over the period presented here, the number of deeply affordable (those under \$50,000) homes has decreased substantially in recent years. There is also some evidence that sales of relatively higher-priced affordable homes (those priced \$50,000–\$100,000) in the node has also decreased in the most recent year. This trend echoes trends in other nodes

in the county, where the number of affordable homeownership opportunities has also decreased. In fact, given the timing of decreases in affordable home sales (which fell earlier in other nodes in the county), it's likely that many affordable home buyers have been pushed out of other nodes and have been seeking homes in the urban townships instead.

Third, while the number of attainable home sales in the urban townships has remained relatively constant, the node has seen dramatic growth in market-rate sales (those over \$200,000) since the third quarter of 2020. This increase coincides with the broader growth in sales in the node, suggesting that additional housing demand is pushing home prices higher. While still rare, the urban townships have also seen a rise in home sales in the very high-priced tiers, including many sales over \$300,000.

Summing it up. Overall, then, we find that the sales data in the urban townships indicates:

- Increasing demand overall for housing in the node as evidence by increasing home sale prices and number of sales.
- Appreciation of the affordable housing (especially deeply affordable housing under \$50,000) into higher sales bands, including the attainable sales band.
- While most homes sold in urban townships are in the 'attainable' housing category, there are increasingly large numbers that are sold in the 'market-rate' category.
- Many homes in the urban townships are now selling in the market-rate housing tier (priced over \$200,000).

We have mapped home sales from 2021 on the Housing Needs Assessment online map ([link here](#)).

Tax Delinquencies and Demolitions

Tax delinquencies and demolitions can signal either neighborhoods at risk of decline (tax delinquencies) or neighborhoods in significant decline but with land available for redevelopment (demolitions).

Tax delinquencies

As of Summer 2022, there are 475 tax delinquent properties in the urban townships out of approximately 18,000 total parcels in the node (a delinquency rate of approximately 2.6%) (see [map here](#)). Here, tax delinquent properties are at least two years delinquent on their taxes. While these properties are spread throughout the node, it appears the vast majority of these parcels are located in Madison Township, especially the portion just east of Mansfield.

Demolitions

According to the Richland County Land Bank, as of Summer 2022, they have conducted demolitions on 25 properties in the urban townships (see [map here](#)). The majority of those parcels are located in Madison Township immediately northwest of the Mansfield corporation limit.

Zoning Analysis

This next section provides an overview of zoning in the urban townships. It first reviews the townships' zoning map before moving to an analysis of their zoning codes.

Zoning Map

We have mapped the urban township's zoning districts at [this link](#). With the exception of Madison Township, the majority of land in the urban townships is zoned for R1 residential. In Madison Township, however, a substantial amount of land is zoned for R3 residential, especially those parts of the township closest to Mansfield. There is also a substantial amount of land zoned R2 residential in Madison Township further from Mansfield as well.

Zoning codes

This section reviews the zoning codes of the urban townships. Each of the townships has its own zoning code, and there are few similarities in terms of parameters across them. We have summarized the urban townships' zoning codes at these links ([Madison](#), [Mifflin](#), [Springfield](#), [Washington](#)) and have summarized all residential zoning codes in the county (except for those in the rural townships) [at this link](#)

In terms of their R1 zoning codes, Madison, Mifflin, and Springfield Townships all allow one- and two-family dwellings by-right, while Washington Township's zoning code allows one-family dwellings by-right and is inconsistent as to whether two-family dwellings are allowed by-right.² For conditional uses, Madison and Mifflin Townships allow for zero-lot line developments, while Mifflin Township also allows for various elderly and convalescent homes. Springfield and Washington Townships do not provide any conditional uses in their R1 zoning codes.

In terms of zoning parameters of the R1 zoning codes, we note the following which impact the types of housing that can be developed in each township:

² While the zoning ordinance says that only one-family dwellings are allowed by-right in the R1 district, the schedule of regulations in the zoning code lists one- and two-family dwellings as allowed by-right.

- Madison Township requires very wide lots (minimum of 90') for both one- and two-family dwellings and does not allow for higher density of two-family dwelling units—the maximum allowable density is capped at 2.12 units per acre.
- Mifflin Township allows for relatively higher density for single-family dwellings (4.6 units per acre) and does allow for higher density for two-family dwellings (9.2 units per acre).
- For parcels served by centralized sewer systems, Springfield Township allows for even lower densities (3.63 units per acre) for single-family dwellings. However, allowable densities for two-family dwellings would be 7.26 units per acre.

In terms of their R2 zoning districts, the zoning codes for each of the townships is quite complex, with unique zoning parameters for different uses (e.g., different lot size requirements for one-family dwellings, townhouses, and multi-family dwellings). In terms of uses permitted by-right, Madison, Mifflin, and Springfield Townships allow for one- and two-family dwellings, townhouse dwellings, and multiple family dwellings by-right. In contrast, Washington Township only allows for one- and two-family dwelling units by right, but at a higher density than allowed in its R1 district.

In terms of conditional uses in their R2 zoning districts, both Madison and Mifflin Townships allow for zero-lot line dwellings. Mifflin and Springfield Townships both allow for nursing/convalescent/rest homes. Finally, Washington Township allows for townhouse dwellings.

While an overview of the parameters of each of the zoning codes is beyond the scope of this report, we note the following:

- For one- and two-family dwellings (which are permitted in both R1 and R2 zones in most of the townships), the R2 zoning allows for higher density. Nevertheless, Madison Township caps two-family dwelling unit density at 5.01 units per acre, which is less than the allowable R1 density in Mifflin and Springfield Townships.
- In general, the highest allowable densities in these townships are for multifamily and townhouse-type dwelling units and is capped at 18 units per acre in Madison and Mifflin Townships.
- Like many of the nodes in Richland County, the townships require extensive landscaping and obscuring fences for any multi-family development. Such requirements push developers toward larger, suburban-style apartment developments and away from smaller, more neighborhood-scale multifamily developments (e.g., a four-plex).

Finally, only Madison and Washington Townships have R3 districts, though Washington Township calls this a MD District). For Madison Township, the types of housing units permitted by-right are the same in the R3 zone as in the R2 zone, but the allowable densities are increased (to 6.22 units per acre for one- and two-family dwellings and 21 units per acre for townhouse dwellings).

Madison Township's R3 zone also allows for zero-lot line dwellings, medical institutions, and elderly housing as conditional uses. Washington Township's MD zone has the same parameters and allowable uses (both by-right and conditional) as its R2 zones.

Finally, the urban townships have several other zoning districts that allow housing as either a by-right or conditional use. These include:

- Madison Township
 - R4: Same uses as R3 but allows one mobile home permitted per lot
 - PD (Planned Unit Development): permitted according to R1, R2, or R3 zoning districts
 - MH (Mobile Home Park) District: permits mobile homes parks of at least 70 homes or 10 acres.
- Mifflin Township
 - C (Conservation District): only one-family dwellings are permitted; the maximum density is one unit per 5 acres
 - B1 (Neighborhood Business) District: permitted R1 and R2 residential uses allowed by-right
 - B2 (General Business) District: permitted R1 and R2 residential uses allowed by-right
 - MH (Mobile Home Park) District: permits mobile homes parks on at least 10 acres
 - PD (Planned Unit Residential Development): allows for one- and two-family dwellings, townhouse, and multi-family units by-right. Has greater flexibility for higher density developments "if the character of the development and/or amenities incorporated in the development improve the physical conditions of an area, thereby justifying an increase in density."
- Springfield Township
 - RR (Rural residential): only one-family dwellings are allowed by-right, no conditional uses, maximum density of 2 units per acre
- Washington Township
 - PR (Planned Residential) District: one-family and multifamily dwellings (including detached, semi-detached, and attached) units permitted by-right; maximum density of 2 units per acre for one-family dwellings and 4 units per acre for multifamily dwellings
 - PC (Planned Commercial) District: apartments allowed by-right provided they do not exceed 10 percent of the development's gross area
 - MH (Manufactured Home) District: Manufactured housing parks of at least 10 acres allowed by-right

Housing Development and Suitability Analysis

This section presents a housing development analysis for the urban townships. It first details opportunities to encourage the development of market-rate housing and identifies a site in

Madison Township where attainable housing development could be pursued. It then discusses the suitability of developing affordable housing either through the competitive tax credit program or through other programs.

Market-rate housing

Conversations with several local developers have identified the urban townships as prime real estate for the development of attainable housing in Richland County. Reasons given for this include the relatively low cost of land in the townships, the presence of many vacant and under-utilized parcels, and zoning districts (especially in Madison Township) that are favorable to developing small multifamily dwellings (including two-family dwelling units and condos).

Given this apparent development interest, it is crucial for the townships to ensure that their policies and practices related to permitting housing development are in place. The probable upcoming development also presents an opportunity for the urban townships to strategically use their PD (planned unit development) districts to guide housing development so that it best serves their needs. PD districts can encourage development in certain districts and provide general design and massing guidelines for what development does occur. While these districts can be excessively bureaucratic at times, when implemented well (as more guidelines than mandates) they can ensure that housing development occurs that is beneficial both to new and existing residents.

One area where a PD zoning district might be helpful in guiding future development in the urban townships is in the pictured areas off Ashland Road in Madison Township (see Exhibit 1 below). This area, which combines three separate parcels, could be developed into attainable housing (duplexes and small multifamily units) with easy access to Ashland Road and US-30. The site is currently zoned B (Business) but is surrounded to the north and west by areas zoned R2. The site does not currently have sewer access but is surrounded by parcels that do, so extending the sewer lines should (likely) not be prohibitively expensive.

Excluding the 'flag pole' portion of the lot (the skinny section connecting the bulk of the property to Ashland Rd.), the developable portion of the lot comprises approximately 10.75 acres. A PD district could guide development by providing guidelines on building types, massing, and density. Alternatively, though, Madison Township could explore re-zoning the land as R2 (to match the surrounding zoning) or R3 (to reflect its proximity to a collector road and commercial area) to encourage housing development.

The types of development the site could support include two-family dwellings, townhouse-style dwellings, and potentially small multifamily dwelling units as well. Madison Township's zoning allows for relatively high density for the latter two types of development, with a maximum density of 18 townhouse units per acre in the R2 zone and 21 units per acre in the R3 zone. Allowing for

that level of density can ensure that the housing developed targets the 'attainable' market segment, as it allows the developer to spread the cost of development across more housing units.

Exhibit 1: Possible development site in Madison Township



Affordable housing

The largest affordable housing program in the U.S. is the Low-Income Housing Tax Credit program, or LIHTC. LIHTC programs are administered by the Ohio Housing Finance Agency (OHFA). There are two types of tax credits available through LIHTC—competitive (9%) tax credits

and non-competitive (4%) tax credits. The allocation process for both types of tax credits is governed by a Qualified Action Plan (QAP), which OHFA produces once every two years.

As expected given their name, there is strong demand for receiving competitive tax credits, and the QAP sets out the criteria by which OHFA will award those tax credits to developments. To minimize the amount of discretionary review of tax credits, OHFA has adopted (in both its current QAP and in prior ones) strict geographic criteria that award 'points' to tax credit proposals under the title of 'New Affordability Pool Priorities.' Given the incredibly competitive nature of these proposals, it's crucial that proposed developments be located in the highest-scoring areas. In fact, missing out on even a single point means that projects may not be funded.

One unique aspect of how OHFA awards tax credits is that it has classified every Census tract in the state as central city, metro/suburban, and rural. OHFA then awards tax credits to developments in each of these 'pools,' so that a disproportionate number of tax credit developments are not awarded to, say, central city tracts. For the urban townships, most of Madison Township and portions of Washington Township north/west of I-71 are considered 'metro/suburban' while all of Springfield and Mifflin Townships, plus the remainder of Washington Township, are considered 'rural.'

OHFA has created an interactive map [here](#) for rural tracts and [here](#) for metro/suburban tracts with the various geographic criteria it considers when awarding competitive tax credits for new construction. Given the expansive nature of the urban townships, in this section we will focus on areas that could receive the maximum number of points under OHFA's current scoring system.

One should note that OHFA's scoring system is very heavily weighted toward transit access for new developments, as this receives a maximum of 5 points. For developments in Richland County's rural tracts, they can receive the maximum number of possible points (5) if the development coordinates an on-demand transportation service. The development can also receive 3 points if it provides transportation at no cost to the resident and is available at least five times per week.

For the metro/suburban tracts, developments' score is related to the Transit Connectivity Index Score of the Census tract in which they are located. Unfortunately for tracts in the urban townships, these developments would almost all score a 0, with the exception of those in Madison Township northwest of Mansfield in Tract 15, which would score a 1. In conversations with OHFA staff, developments scoring this low on the transit score can almost never make up the missed points on the transit score, and so we will not consider them further in this analysis.

Within the remaining portions of the urban townships, any family (non-senior) development in Springfield Township would receive the maximum number of possible points based on OHFA's

rural tract criteria. Any senior development in Springfield Township would also receive the maximum number of possible points provided it was within 5 miles of the Area Office on Aging in Ontario. Again, though, earning the maximum number of possible points would be premised on the development providing on-demand transportation for residents, or at least providing free transportation to residents at limited times of the week (in which case it would only lose 2 points on the transit score).

Additionally, any family (non-senior) development in Mifflin Township would earn all but one point on OHFA's geographic criteria, and a development could earn a similar number of points for a senior development if it was within 5 miles of a senior center. Again, the same caveat on developments providing transportation would apply to any development in Mifflin Township as well.

Beyond the tax credit program, there are opportunities for affordable developments in the urban townships using non-competitive tax credits or through other means. In fact, given the many opportunities in the urban townships (good schools, access to employment, relatively low crime), developing additional affordable housing in the urban townships would greatly benefit the lives of those who would live there. Further, it would provide a nearby workforce for many of the service-sector businesses that are in the node.

Identifying Housing Needs and Recommendations

This document has provided a Housing Needs Assessment for the urban townships of Richland County. Based on the findings presented in this document, we make the following recommendations to address the urban townships' housing needs and to strengthen its housing market.

Consider unifying zoning codes across the townships. The jurisdictional fragmentation common across Ohio, whereby each township can adopt its own zoning code, leads to confusion among developers and additional development costs. The urban townships (and the jurisdictions within them) should consider unifying zoning codes across their boundaries, such that an 'R1' zoning designation has the same parameters in each of the townships. This simplification would promote development in the urban townships by making the zoning codes of each jurisdiction easier to understand.

Even if such a change is too difficult, the townships would also benefit from a general simplification of their zoning codes. Many of the townships have some of the most complex zoning codes within Richland County, and any simplification of zoning rules would only encourage housing development within the township.

Explore ways to prevent the negative effects of displacement for mobile home park residents. The urban townships have the most mobile homes of any node in the county, and about 1 out of every 20 housing units in the node is a mobile home. [Given the current development pressures on mobile home parks across the country](#), it is likely that many of these properties will be redeveloped in the coming years either as other types of housing or to a higher standard, thus raising lot rents. Regardless, development will frequently lead to the displacement of existing residents. Many cities across the country are exploring ways to protect mobile home park residents, and Strategy Guide and Action Plan will explore these strategies.

Consider encouraging the development of an application for competitive tax credits in Springfield Township. As noted earlier, Ohio's QAP changes every two years, and the criteria against which proposals are judged change with that QAP. Under the rules of the current QAP, any tax credit development in Tract 22 (in Troy Township) would be very competitive, especially regarding the QAP's 'New Affordability Pool Priorities.' To promote tax credit development, the township or county could identify a suitable parcel and then put together an RFP requesting that an experienced tax credit developer partner with the county and a local non-profit to develop the parcel. The development could either target families or seniors, though it would need to provide on-demand transportation services to earn the most possible points.