

The Land Use Law Center's 21st Annual
Alfred B. DelBello
Land Use and Sustainable Development Conference

**Land Use Under Siege:
Revisiting Well Grounded**

December 8, 2022



**Land Use and
Sustainable
Development:
Cases and Materials**

3:30 – 4:50PM **Law Update Session** *Jl-Lecture Hall*

**Land Use and Sustainable Development: Cases and
Materials**

Moderator: Michael D. Zarin, Esq., *Partner, Zarin & Steinmetz*

Michael Allan Wolf, Esq., *Professor of Law & Richard E. Nelson
Chair in Local Government Law, University of Florida Levin
College of Law*

Dwight H. Merriam, Esq., *FAICP, Attorney at Law*

Shelby D. Green, Esq., *Co-Counsel, Land Use Law Center &
Professor of Law, Elisabeth Haub School of Law*

Donald L. Elliott, Esq., *FAICP, Director, Clarion Associates, LLC*

No Silver Bullet:
A Realistic Assessment of the Elimination of Single-Family Zones

Michael Allan Wolf
Richard E. Nelson Eminent Scholar Chair in Local Government
University of Florida Levin College of Law

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Pace Law School
December 8, 2022

Rather than eliminating single-family detached housing from the list of permissible zoning classifications, as in Minneapolis, California, and Oregon, local governments should instead consider amending their zoning codes to allow duplexes, triplexes, and quadplexes—that is, missing middle housing—in *all* single-family zones *not as-of-right*, but instead by special or conditional use permit.¹ The ordinance could specify that one condition for securing a permit for multi-family housing would be certification that there are not existing, applicable one-family restrictions that affect the parcel(s) or that the relevant homeowners' association has, by valid means, waived enforcement of such restrictions.² Another possible condition would be an objective property appraisal documenting neutral or even positive effects on the values of nearby properties.³

1. See, e.g., *La Rue v. East Brunswick*, 172 A.2d 691, 701 (N.J. Super. Ct. App. Div. 1961) (“The amendment expressly permits multiple dwelling groups (subject, of course, to the mechanics of Board of Adjustment approval) in R-1 districts, and expressly amends the R-2 and R-3 districts to permit them in the same manner as R-1.”).

2. One advantage is that this will eliminate the need to preempt neighborhood covenants mandating single-family units (which is vulnerable to a successful takings challenge if brought before the “right” judge or panel of judges).

3. See Mai Thi Nguyen, *Does Affordable Housing Detrimentially Affect Housing Values? A Review of the Literature*, 20 J. PLAN. LITERATURE 15, 16–17 (2005); Lan Deng, *The External Neighborhood Effects of Low-Income Housing Tax Credit Projects Built by Three Sectors*, 33 J. URB. AFF. 143, 143 (2011) (“Using a difference-in-difference hedonic regression approach, this study finds that almost all the LIHTC [low-income housing tax credit] projects examined have generated significantly positive impacts on nearby property value.”).

The use of special or conditional use permits in this way can provide an effective way to study the impact on nearby property values of departing from single-family zoning. It can also ensure that eliminating the single-family zone is not a gentrification scheme that could result in the displacement of economically vulnerable local residents or that could endanger the continued existence of a socioeconomically and racially integrated neighborhood. Communities that employ the special use permit approach without negative effects could one day transition to an as-of-right scheme.

Michael Allan Wolf, *A Respectful Rejoinder to Two Zoning Legends*, 71 KANSAS LAW REVIEW 307, 311-12 (Forthcoming, 2022).



Louisburg Square, Beacon Hill, Boston (developed 1830s-1840s)



Llewellyn Park, East Orange, New Jersey (developed 1850s)



Guildford, Baltimore (opened 1913)



Eight-mile (Birwood) Wall, Detroit (1941)



**Fire burning the belongings of Johnetta and Harvey Clark,
Cicero, Illinois (July 11, 1951)**



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Land Use and Sustainable Development

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Confronting Covenants and Promoting Affordability

Dwight Merriam, FAICP
www.dwightmerriam.com

Three Roadblocks to Affordability



1. Home Rule

“The constitutional and statutory foundation for local government in New York State provides that counties, cities, towns and villages are “general purpose” units of local government. They are granted broad home rule powers to regulate the quality of life in communities and to provide direct services to the people. In doing so, local governments must operate within powers accorded them by statute and the New York and United States Constitutions.”

“The home rule powers available to New York local governments are among the most far-reaching in the nation. The extent of these powers makes the local government a full partner with the state in the shared responsibility for providing services to the people.”

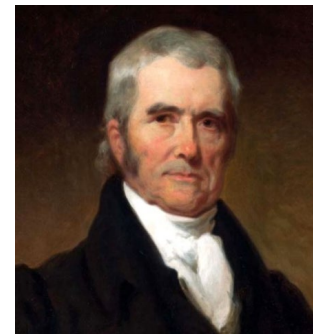
https://video.dos.ny.gov/lg/handbook/html/local_government_home_rule_power.html

The Home Rule Myth

The authority to plan and regulate land use is fundamentally the police power...to protect, and promote the public's health, safety, and general welfare.

Chief Justice Marshall described the police power as “that immense mass of legislation, which embraces every thing within the territory of a State, not surrendered to the general government.”

Gibbons v. Ogden, 22 U.S. (9 Wheat.) 1, 202 (1824)



“Restrictions on Local Law Powers

The local law power is not without its limitations. The restrictions upon the exercise of the local law power are as follows:

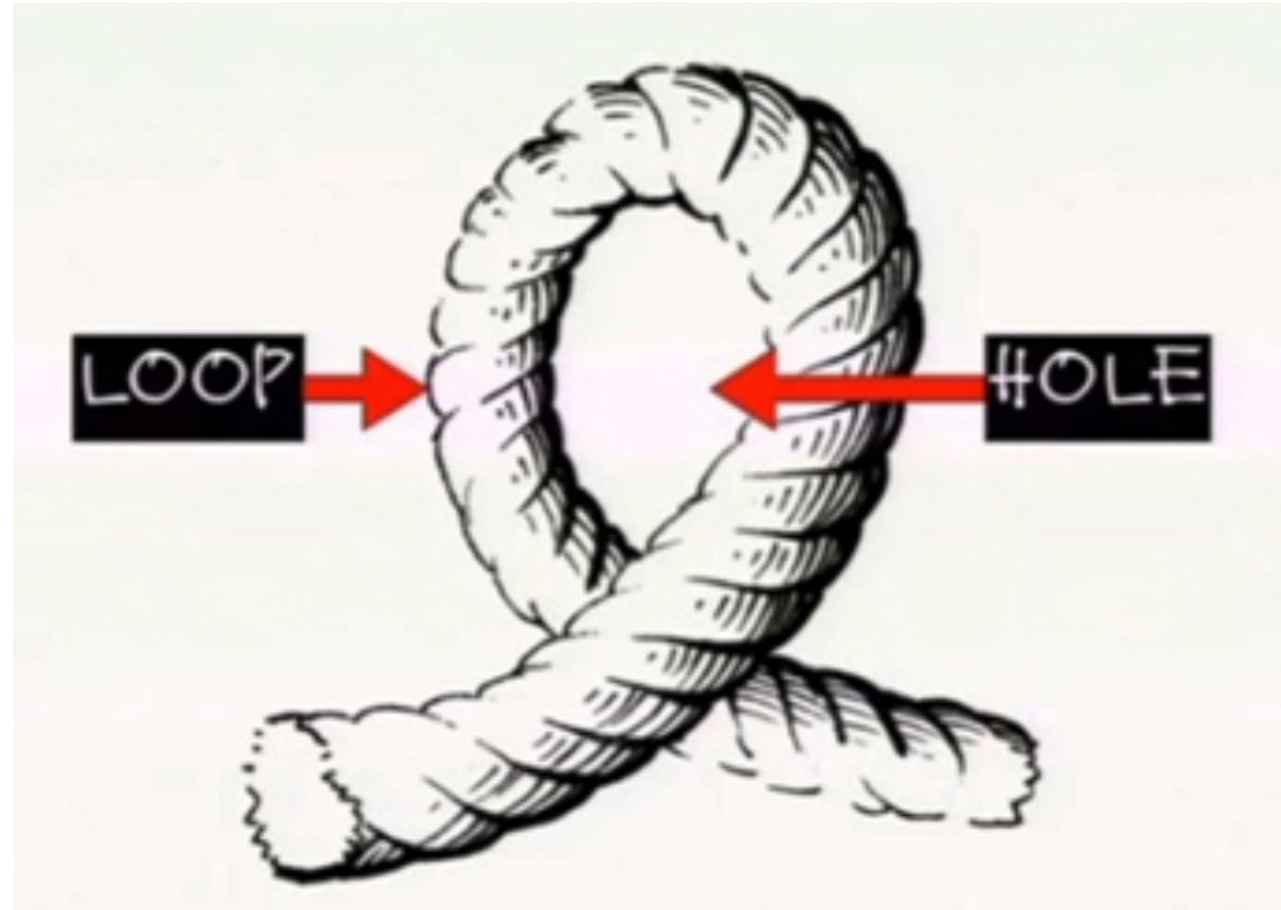
A local law cannot be inconsistent with the Constitution or with any general law. ...

Local law power is restricted where the subject of the local law is one considered to be of “state concern.” ...

Local law power is restricted where the subject of proposed local law action has been preempted by the state. ...”

https://video.dos.ny.gov/lg/handbook/html/local_government_home_rule_power.html

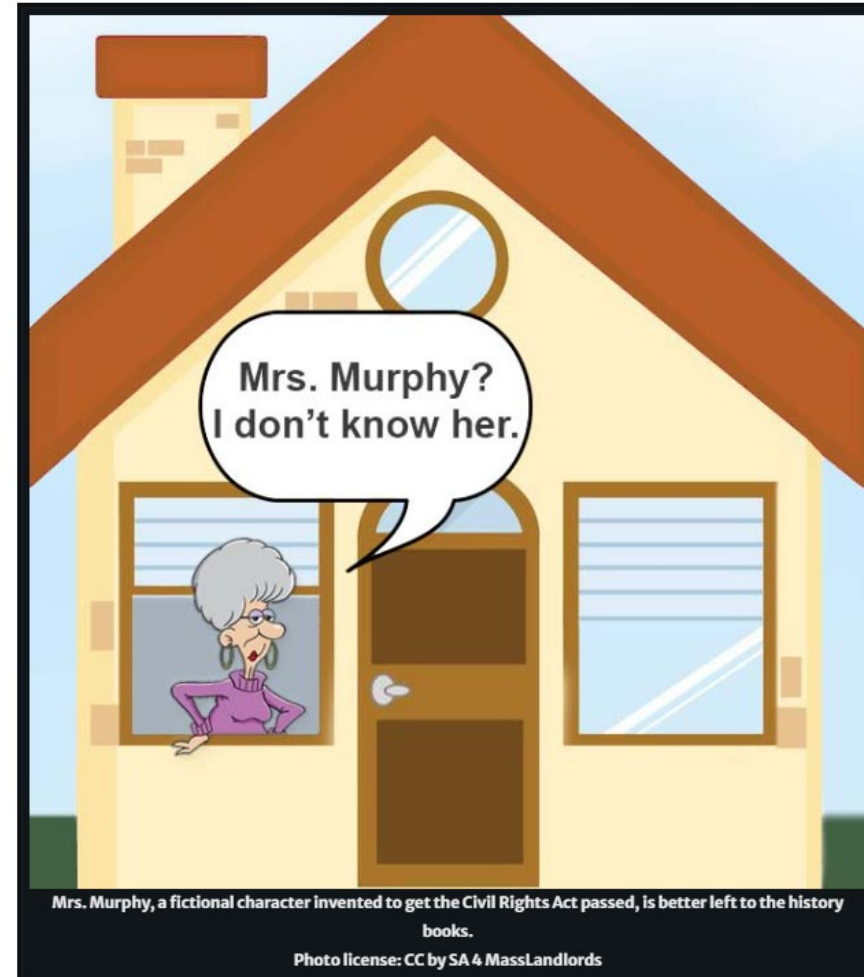
2. Fair Housing Act



The “Mrs. Murphy Exemption”

“...rooms or units in dwellings containing living quarters occupied or intended to be occupied by no more than four families living independently of each other, if the owner actually maintains and occupies one of such living quarters as his residence.”

42 U.S. Code § 3603(b)(2)



Don't Wait for the Feds



State

“and (H) affirmatively further the purposes of the federal Fair Housing Act, 42 USC 3601 et seq., as amended from time to time;”

<https://www.cga.ct.gov/2021/act/pa/pdf/2021-PA-00029-R00HB-06107-PA.pdf>

Local

Eugene Analysis of Impediments to Fair Housing Choice 2020-2024

<https://www.eugene-or.gov/DocumentCenter/View/55253/Eugene-Analysis-of-Impediments-Summary-4-20-2020->

3. Covenants

“A property covenant is an agreement between two or more parties regarding certain use of a piece of real property. The covenant will either benefit or burden the landowner. A covenant that burdens the landowner is also called a restrictive covenant.”

There are two types of restrictive covenants: affirmative and negative.

An affirmative covenant obligates a person to act.

For example, a covenant that requires the homeowner to keep the trees trimmed in the yard is an affirmative covenant.

A negative covenant prohibits a person to act.

For example, a negative covenant can forbid a homeowner from building a fence.”

https://www.law.cornell.edu/wex/covenant_that_runs_with_the_land

Racial

From a 1926 deed in a Los Angeles development

"1. That no part or portion of any of the real estate hereinafter set forth shall be leased or rented to any person or persons other than of the White or Caucasian race, for a period of 99 years. 2. That no part or portion of any of the real estate described shall be used or occupied, or permitted to be used or occupied, by any person other than of the White or Caucasian race."

Unenforceable after *Shelley v. Kraemer* (1948)

Eliminating Them

Uniform Law Commission:



“The Uniform Law Commission (ULC, also known as the National Conference of Commissioners on Uniform State Laws), established in 1892, provides states with non-partisan, well-conceived and well-drafted legislation that brings clarity and stability to critical areas of state statutory law.”

Restrictive Covenants in Deeds Committee

[Proposed new name: Removal of Prohibited Restrictions in Deeds Act]

This committee will draft uniform or model state legislation enabling an owner of land for which a discriminatory restrictive covenant appears in the chain of title to have that covenant released or expunged from the records. The committee is charged with establishing a general policy approach, subject to review of the Executive Committee, before it begins to draft.

<https://www.uniformlaws.org/committees/community-home?CommunityKey=f263def2-f766-4c76-af56-016f6878034f>

Enforceable Covenants

Over **7 million** people live in gated communities

58% of homeowners live in HOA communities

40 million housing units are part of HOAs

73.9 million Americans live in HOAs, condominium communities, or cooperatives

61% of new dwellings have covenants (CAI)

Trend is Accelerating

10 times as many HOAs today as there were in 1980
(36,000 to 355,000)

About **8,000** new HOAs form
each year (22 every day)

82.4% of homes sold in 2019
were part of HOA communities



What's the Problem?

The minimum heated livable area of any residence, excluding garages, basements, porches, storage rooms, workshops, etc., shall be not less than **3,500 heated square feet** for a two-story residence.

The majority of the dwelling must be **brick or stone**.

Garages must be a minimum of **three-car**

No Lot shall be used except for residential purposes and no building shall be erected, altered, placed, or permitted to remain on any Lot other than **one single family dwelling**, unless otherwise provided for herein.

No Lot shall be subdivided.

“Family” shall mean and refer to only those persons who live in the same household, or are related, such as father, mother, son, or daughter.

Action Required

Amend state statutes

- “Affirmatively further”
- California AB 721
- Overcome precedent

***Viking Properties, Inc. v. Holm*, 118 P.3d 322, 155 Wash. 2d 112 (2005).**

Think local

- **Make covenant review part of zoning, as we do with condominium documents**
 - **E.g., Yarmouth, Mass. typical: “The Site Plan Review Team may review condominium documents before application to the Board of Appeals, at the discretion of the Building Commissioner.”**
- **Limit permitted private covenants**
- **Require an “affordability impact statement”**
- **Impose time limits on covenants**
- **Have right to recall, as in reserved parking**
- **Advocate simple majority to amend some restrictions**



- **Voluntary covenant amendments**
 - Density bonuses
 - Tax abatements
 - Reverse auction
- **Not-So-Voluntary**
 - Eminent domain
 - Damages?



California

AB 2011 The Affordable Housing and High Road Jobs Act

(Sep 28, 2022)

Ministerial, by-right approval for affordable housing on commercially-zoned lands and allows such approvals for mixed-income housing along commercial corridors, if the projects meet specified affordability, labor, and environmental criteria.

AB 2221 Accessory dwelling units

(Sep 28, 2022)

Accelerates Accessory Dwelling Unit development by clarifying ambiguities in existing law and removing arbitrary barriers that some cities have imposed on ADU development.

SB 886 California Environmental Quality Act: exemption: public universities: university housing development projects

(Sep 28, 2022)

Universities can build housing projects on their campus faster and for lower cost by streamlining the CEQA review process.

AB 602 Development fees: impact fee nexus study

(Sep 28, 2021)

Increases impact fee transparency and requires impact fees to be proportional to the size of a new home so that smaller individual homes pay smaller fees.

SB 478 Planning and Zoning Law: housing development projects

(Sep 28, 2021)

Removes artificial barriers cities establish that have the effect of reducing the number of homes that can be legally built on a property. By establishing minimum standards for technical issues such as floor area ratios and minimum lot sizes, the Housing Opportunity Act ensures that more homes are built on properties where multi-family homes are already legal.

AB-721 Covenants and restrictions: affordable housing

(Sep 28, 2021)

Makes certain covenants unenforceable against the owner of an affordable housing project.

SB 9 Housing development: approvals

(Sep 16, 2021)

Allows two homes on every property zoned for single-family homes in California. By streamlining the process to split a lot or create a duplex the law will lead to a substantial increase in the amount of housing available in neighborhoods throughout the state. When paired with recent ADU legislation, homeowners are now able to build up to 3 new homes on their lot.

SB10 Planning and zoning: housing development: density

(Sep 16, 2021)

Allows cities to streamline the upzoning of lots near jobs and transit. By enabling cities to increase the density of these lots up to 10 units without triggering an environmental review, this law makes it easier to build housing for young people and working families.

Fini

Dwight Merriam, FAICP

dwightmerriam@gmail.com

www.dwightmerriam.com

<https://www.facebook.com/dwightmerriamesq/>

<https://dwightmerriam.wordpress.com/>

<https://www.linkedin.com/in/dwightmerriam/>

<https://twitter.com/DwightMerriam>

80 Latimer Lane
Weatogue, CT 06089
(860) 463-7233



Building and Designing Inclusive and Climate- Resilient Communities

Out of Sync

Historical Land use law, policy and patterns

Evolving notions of equity and fairness

The ecological trends of the natural world.

And the two are very much interrelated.

The Claim of all

Safe and inviting communities

Land use policy should not by intention or effect

operate to exclude on account of race or ethnicity or socio-economic status.

What we are doing

reassessing the effects of historic discriminatory land use policy

embracing a new urban design concept

—one that, if not climate-determinist, is climate-cognizant.

Must reconcile impacts from the built environment and the natural environment towards climate and social equity.

Two Prominent Responses

Righting historic practices of exclusion:

Re-writing land use laws and policies
For access to housing and opportunities for
individual and economic thriving

Rethinking our connections with the natural world:

Prescribing and incentivizing sustainability

Brad Pitt's *Make it Right* Project Aimed to do both

The Lower Ninth Ward was hardest hit by Hurricane Katrina.

Hundreds of homes and lives lost.

It was a poor community, the *bottoms*.

The pace of redevelopment was slow.

Brad Pitt stepped up.

Teamed with William McDonough, a green design expert, and Cherokee, an investment firm, that specialized in sustainable redevelopment.

Declared: “If you have this *blank slate* and this *great technology* out there, what better test than low-income housing?”

Pledged to match \$5 million in contributions to the project, as did other philanthropists. Some firms donated services.

- **They proposed 150 homes**
 - For first-time homeowners
 - To bring back a community devastated by the hurricane.
- **To revitalize the community and bring people back together,**
 - They built a *community garden* and held *regular meetings* for the new homeowners.

What the planners learned from Hurricane Katrina.

Some of the culprits for so much of the losses:

Siting and design

Poorly constructed and poorly maintained homes

Built in the path of flooding

With no escapes

City's Response:

Adopted the most recent versions of:

International Building Code

International Residential Code

International Energy Conservation Code

Make it Right's Designs:

*"We've cracked something here;"
"These houses ...
redefine affordable housing. ... This is a proving ground for a bigger idea that could work globally. This project is not mine anymore. It's so beyond me."*

Constraints:

- No house should cost more than **\$150,000**, of which, it was hoped, the new owners would be able to put up 85 percent from insurance and government disaster funds.
- Because most lots were long and narrow, just 40 feet wide, the houses would also have to be long and narrow.
- All houses had to be **raised eight** feet off the ground.
- All were required to have a **hatch** in the roof.

Sustainability Features

- Geothermal systems for heat.
- Solar roof panels for at least 75 percent of electricity perhaps even send power back to the grid on sunny days.
- Materials and equipment were required to meet the strictest environmental standards.



Alas...

Brad Pitt's dream became a nightmare.

I'll show you how in a moment.

The Looming Omens

**Before Hurricanes Katrina and Sandy and Harvey and Florence and Rita,
we didn't heed the omens**

**After their strike, were we able to identify some of the culprits of the disastrous
impacts:**

- **Poorly constructed and poorly maintained homes**
- **Built in the path of flooding**
- **With no escapes**

**Most of those affected were renters and poor—a high (50 to 80 %—Puerto Rico) with
annual incomes below \$30K.**

Lost Affordable housing is less likely to be rebuilt.

Housing is not just a physical thing

A social, economic and political construct

Good and ample housing

are places for individual thriving and enrichment

family cohesion autonomy economic security.

Poor and inaccessible housing

means demoralization

bad health wealth barriers family dysfunction.

Euclidean Zoning's Iron Grip Over land Use

All kinds of tools of exclusion

large lot requirements minimum set backs limits on housing forms
(no tiny homes, no manufactured homes and no multi-unit dwellings, to name a few)

Seeing past neutrally-worded ordinances

for what they are—a tool for separating citizens by status and race.

But, the *Mt. Laurel* saga where the court tried to break down barriers to alternative housing construction, went on for more than 40 years.

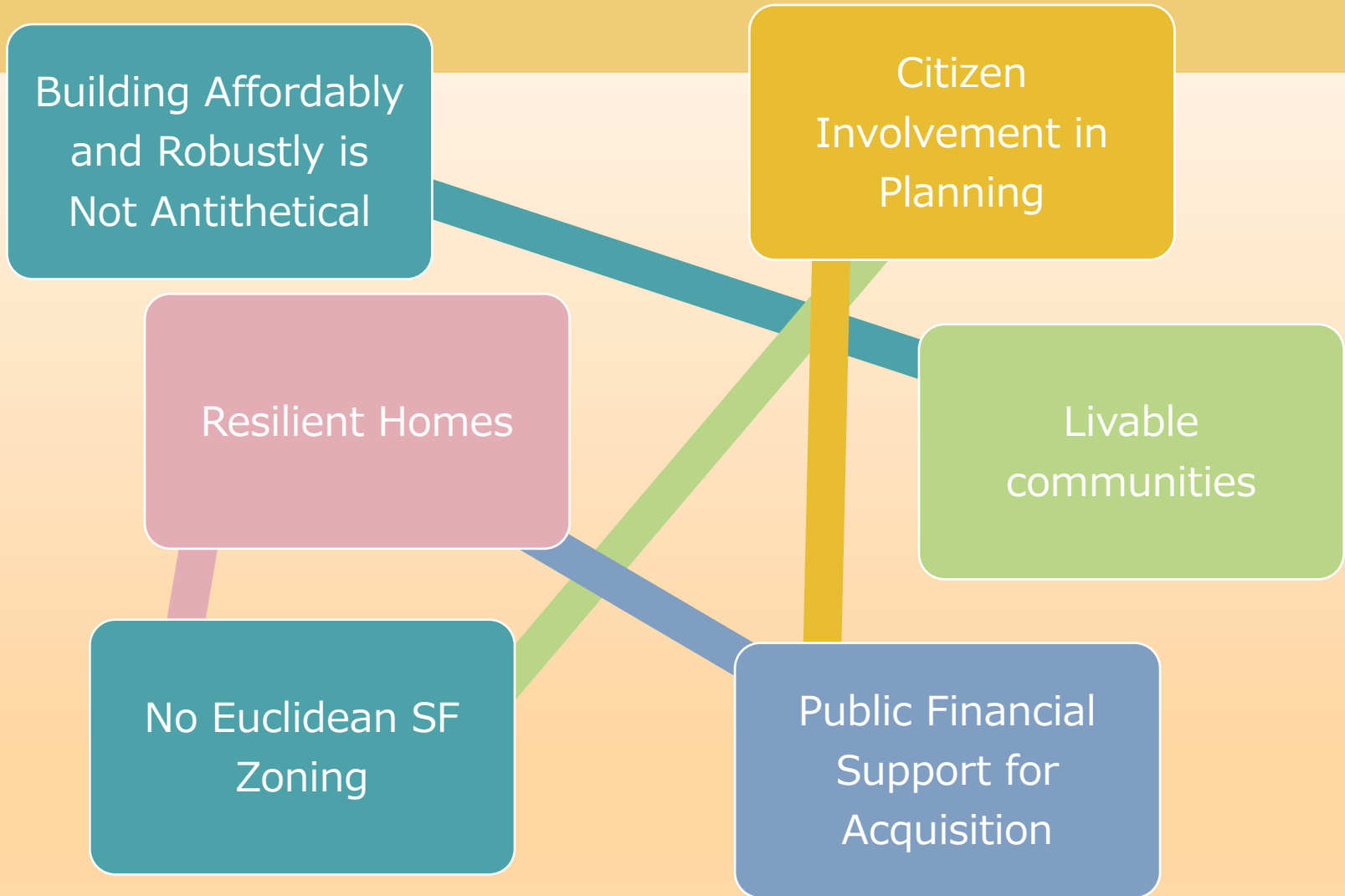


Building Inclusive and Climate Resilient Communities

- **Land Use Regulation: a Double-edged sword**
- **Calls for a New Paradigm**
- **What Cities and States are doing**



New Paradigm



Inventions for the Robust Home and the Resilient Community

Construction standards

New Building and Planning Standards for Going Green

Updated International Building Codes

2021 International Energy Conservation Code

Wildland Urban Interface Code

Energy Efficiency Standards

US Green Building Council ---LEED

- Green and Robust Homes

High performance and passive homes

Other Inventions

Other inventions

Green/cool roofs

High tech plumbing

Site orientation of structures

- Green Public Infrastructure

Fewer Roads

Stormwater diversion

Wider/one-way sidewalks

More trees/urban forests

Renewable energy sources

Water conservation

Rainwater capture

Pervious services

Street closings to vehicular traffic

Other Measures

- Elevations

Of critical systems

Of structures

- Fire resistant materials

- Fortifications

- Adaptive Reuse

What happened with the 2021 Marshall, Colorado Fire



Superior, Colorado before and after the fire.

How do zoning and land use regulations factor in?



Rebuilding after the Fire

Before the Marshall fire:

the city council adopted
the 2021 International Energy Conservation Code (IECC).

The code required, *inter alia*

new buildings to be built with certain standards
which include electric vehicle charging stations and
the ability to support solar panels
applicable to rebuilding

After the Fire:

Record numbers of residents are choosing to rebuild high-performance homes
use less energy and little to no fossil fuel energy.

41% of homes that have been permitted to rebuild after the Marshall Fire are building to standards that qualify for
energy efficiency rebates.

**After the 1989
Black Tiger fire,
the city of
Boulder,
Colorado
adopted fire
resistant
construction
standards for
certain areas**



This house has a metal roof and flame-resistant siding.

Shelby D. Green, Elisabeth Haub, Land Use Law Center, December 8, 2022

Infill development in Oklahoma City



New infill homes in OKC's Capitol View neighborhood have 'Fortified' roofs

Positively Paseo completed four homes in the Capitol View neighborhood with roofs that meet the "Fortified" construction standards set by the Insurance Institute for Business & Home Safety, making them extra resilient to storm damage and qualifying them for discounted homeowner's insurance.

The nonprofit community housing development organization, Oklahoma City Housing Redevelopment Corp., built the homes through the city's Strong Neighborhood Initiative.

"... these roofs help form a solid defense against the elements."

Myopia from a Different Vantage

Missing factors in the sustainability prescriptions:

Physical inaccessibility to elevated structures

Lack of citizen participation in community design

Some Costs Comparisons

Zoning/land use regulations	Added cost of housing	Efficiency/resilience	Added cost of housing
Large lots	Higher purchase price	High performance Passive Home Fortified Home	3 to 20% 5 to 10% 3 to 200%
Limits on allowable housing types	Decreases supply	Fortified roofs for Wildland Resistant Home Flood diversion Green/cool roofs	27%
Administrative/ Permitting/impact Fees	10% to 50%	Revenue producing surcharges	

Barriers to Acquisition, but Savings for Retention

Higher Upfront costs are for High Performance home

- The estimates of the cost of compliance with the new Superior, Co. new code:
- from \$20,000 to \$77,000 for a 2,200 square feet home.

Efficiency savings at the back end

- Annual energy costs
- Insurance premiums
- Cost of rebuilding
- Losses from flooding

**The Nightmare:
Brad Pitt's Make it Right Project had *Award-Winning Design—LEED
Platinum***

Sustainability

wood cabinetry
non-toxic paints
Energy Star appliances

Green features

insulation that made them five times more air-tight than typical homes,
photovoltaic systems
groundwater heat pumps for both heating and cooling.

Conservation

separate plumbing lines installed so owners could utilize their rain harvest systems if a current state law banning rainwater for toilet use is repealed.

Less than a decade later

Homes had *decayed* to point of being unlivable.

- Water intrusion
- black mold
- rotting porches
- collapsing stair rails
- fires caused by electrical problems
- plumbing problems
- poor ventilation
- termite infestations

Design and construction flaws

- ❑ Using *TimberSil* for the structure
 - as opposed to chemically pressure treated wood
- ❑ No rain gutters, overhangs, waterproof painting, or covered beams
 - ❑ All necessary for New Orleans' subtropical climate and heavy rainfall.
- ❑ Using flat roofs that could not hold up in heavy rains causing massive water intrusion and subsequent termite infestation and mold.
- ❑ Improper vents causing air quality problems
- ❑ Faulty electrical wiring
- ❑ Defective plumbing problems



Building and Designing Structures to Build Communities

Builders and Planners have the power to create:

The inclusive, equitable and resilient community

That carries a presumption in favor of alternative land uses

Invites in, not zones out

Is prescriptive of *flexible* housing and community design

Uses construction components calibrated to the environment and needs

Non-Structural land use tools/adjustments to incorporate:

Energy efficient siting/orientation of buildings

Streamlined permitting

Building Incentives

Urban Homesteading

Urban Agriculture

Greening/pedestrian-only thoroughfares/parks

Support for Adaptive Reuse

Shelby D. Green, Elisabeth Haub, Land Use Law Center, December 8, 2022

Summary



- Homebuilders and Architects create *structures* for living.
- Administrators and planners build *communities* for living

What Builders, Designers and Planners

- **Not all types of structures are suitable for all areas.**
- **Not all building inventions are essential for sustainability.**
- **Accessible and affordable communities can be built to be green—aesthetically catching, have low carbon impact and be productive.**
- **This requires an integrated design process, with a consideration of not only the structural components, but as much of the social impacts.**

Shared Vision

By Builders and designers of structures and builders of community, on common ends

Builders and Architects must not only understand the mechanics of construction

but also

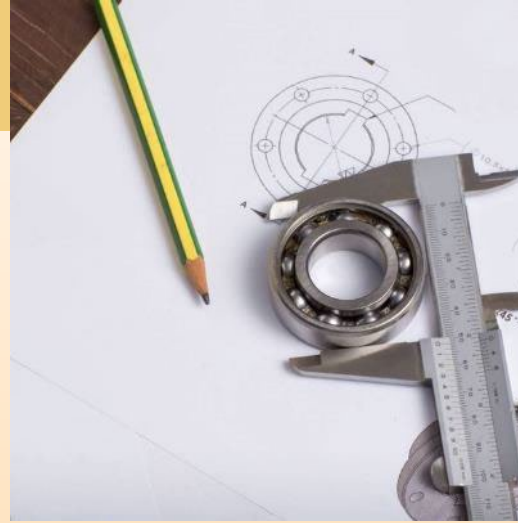
- **the desires and needs of the people of the community**
- **and its community's physical limits**
- **decisions must be preceded by community health and well-being assessments—**
 - **what can the residents afford**
 - **what financial assistance is available**
 - **what kinds of spaces are required**
 - **how many road and trees and stores are there and needed**

Sympathy *not* antagonism

- **Building and designing affordably and resiliently should not mean substandard.**

**That is apparently what happened with the ironically named,
“Make It Right” Project.**

- **Accessible, efficient and robust housing can be one and the same!**



Thank you

SHELBY D. GREEN, SGREEN@LAW.PACE.EDU

APA's Equity in Zoning Policy Guide

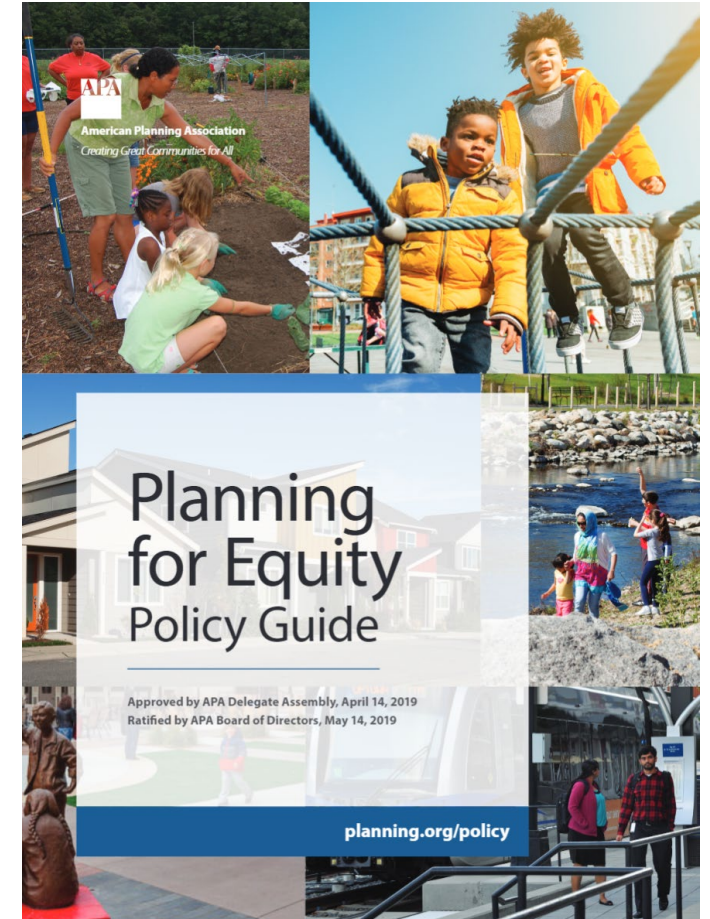
AICP Code of Ethics and Professional Conduct

“Incorporate equity principles and strategies as the foundation for preparing plans and implementation programs to achieve more socially just decision-making. Implement, for existing plans, regulations, policies and procedures, changes which can help overcome historical impediments to racial and social equity.”

Planning for Equity Guide Approved in 2019

Equity in Zoning Policy Guide underway

- Work began in January 2021
- Scheduled for debate, amendment, and adoption on December 15.



Equity in Zoning Procedures

Focus

- Keep it short – 35 pages
- 5 pages of history/background – 30 pages of recommendations
- Zoning (not planning) – and get down to specifics

Three Sources of Inequity in Zoning

- **The Rules** -- Even though they may sound facially neutral
- **The Procedures** – And the people involved in them
- **The Map** – Which often has roots in redlining

Get beyond:

- 1. Inviting People to the Table**
 - Seldom works
 - Outcomes often stay the same
- 2. Housing**
 - There are many sources of inequity in commercial zoning
- 3. “Erase Redlines”**
 - Solutions are much more complex than that

Equity in Zoning Procedures

1. The Rules

- Although all forms of zoning (use-based, form-based, and performance-based) have potentials for biases, many of the big ones involve limitations on permitted use
 - Single-family only zones
 - Prohibitions on disfavored or perceived “low end” commercial uses
 - Limitations on home occupations
- Large lot, large house, large yard dimensional standards are also serious
- Parking, landscaping, design also addressed



Equity in Zoning Procedures

2. The Process

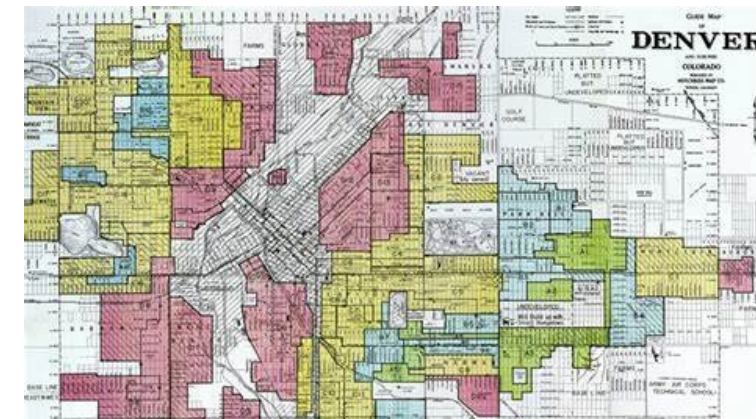
- Equitable representation includes those who:
 - Write codes
 - Apply codes
 - Conduct public hearings
 - Enforce codes
- In some cases, administrative approvals can be more equitable
 - They implement the community goals while avoiding opportunities for NIMBYism
- Capacity building for effective zoning engagement and board service is important



Equity in Zoning Procedures

3. The Map

- “Undoing” environmental injustice is complex
 - Prohibiting expansion and continued concentration of hazardous/polluting uses is the easy part
 - Removing those with legal nonconforming status is harder, and almost certainly involves lots of money
- “Undoing” redlining is complex
 - Equalizing zoning across former redlines may not be the answer and may well result in:
 - Speculative development, gentrification, and displacement; and/or
 - New development that is not affordable to or usable by existing residents
- Better tenant protections will be key



Take Me Out to the Ballgame Reception

5:00PM **Take Me Out to the Ballgame
Reception** *Jl-Atrium*

In honor of John Nolon and his love of the Yankees, conference attendees can join Pace Land Use Law graduates and current students to toast the day and **celebrate** with fun ballgame food and drink.

CONTINUING EDUCATION CREDITS

CLE Credits

NYS Planning & Zoning Credits

Email Ann Marie McCoy at amccoy@law.pace.edu.

CM Credits

Please visit the Certification Maintenance section of APA's website (www.planning.org/cm) to claim credits.

The event will be posted to the APA website soon. We will add the information to our website (<https://law.pace.edu/annual-conference-2022>) as soon as it is available.

AIA/HSW/PDH Credits

Email Valerie Brown at vbrown@aiawhv.org

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