# Home for All

## Northern Kentucky Housing Strategies

HousingNKY.org

Coordinated by

NKADD
NORTHERN KENTUCKY AREA DEVELOPMENT DISTRICT

BRIGHTON CENTER
A COMMUNITY OF SUPPORT

BRIGHTON PROPERTIES, INC.
A COMMUNITY OF SUPPORT

# OVERVIEW

Tara Johnson-Noem
Executive Director

NKADD
NORTHERN KENTUCKY AREA DEVELOPMENT DISTRICT

# NKADD AT A GLANCE

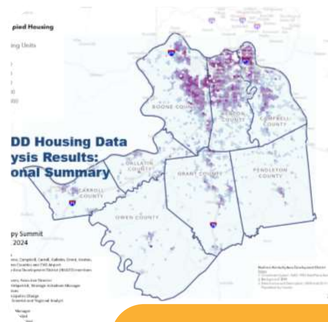

- One of 15 ADDs in Kentucky
- 501(c)3, SPGE, Unit of local government
- Formed in 1971 via KRS 147A
- Governed by a 37-member board of J/Es (8), Mayors (18) and Citizen members (11)
- 88 staff
- FY25 $44.9M total budget

# **NORTHERN KENTUCKY:**
# URBAN, SUBURBAN, AND RURAL

# HOUSING:
## WORKFORCE + COMMUNITY DEVELOPMENT + ECONOMIC DEVELOPMENT

**2021-22**

Employer feedback sparks housing discussion



**2023**

Study finds 6,650 units needed to sustain economic development

**2024**

Housing Coalition forms to create menu of strategies


**2025**

*Home for All: Northern Kentucky Housing Strategies*

2023

# HIGHLIGHTS: NKY HOUSING DATA STUDY

# HOUSING DATA STUDY CONTENTS

- Demographic Analysis by Census Tract
  - Household size
  - Age
  - Household income
- Regional Employment & Commuting Analysis
  - Job types and locations
  - Wages
  - Drive times
- Housing Gap Analysis by Parcel
  - Connecting housing to Area Median Income
  - What can people in NKY jobs afford?
  - Housing supply vs demand
  - Housing production targets
- County Profiles

# KEY TAKEAWAYS FOR THE NORTHERN COUNTIES

**Workforce job creation is out-pacing workforce housing:** The logistics industry is central to job growth in the region, generating demand for high-growth but lower wage "workforce" jobs. Today, there are 2.68 workforce jobs for each housing unit they could afford.

**Monoculture of single-family homes is not aligned with household income and size:** The supply of single-family, 3-4 bedroom homes outpaces the demand. Targeting 'missing middle' homes would better account for the diversity of incomes and smaller household sizes.

**'Missing middle' houses and affordability strategies are required to continue economic growth:** Economic growth creates a strong labor demand. A lack of housing affordable for jobs being created will make it harder and more expensive for employers to find and recruit labor at prevailing market wages.

# KEY TAKEAWAYS FOR THE SOUTHERN COUNTIES

**Job density is constant:** Job growth is concentrated in northern counties industry clusters while the southern counties maintain a steady baseline of jobs. Job creation generates demand for housing. The majority of housing demand is being met closer to the jobs.

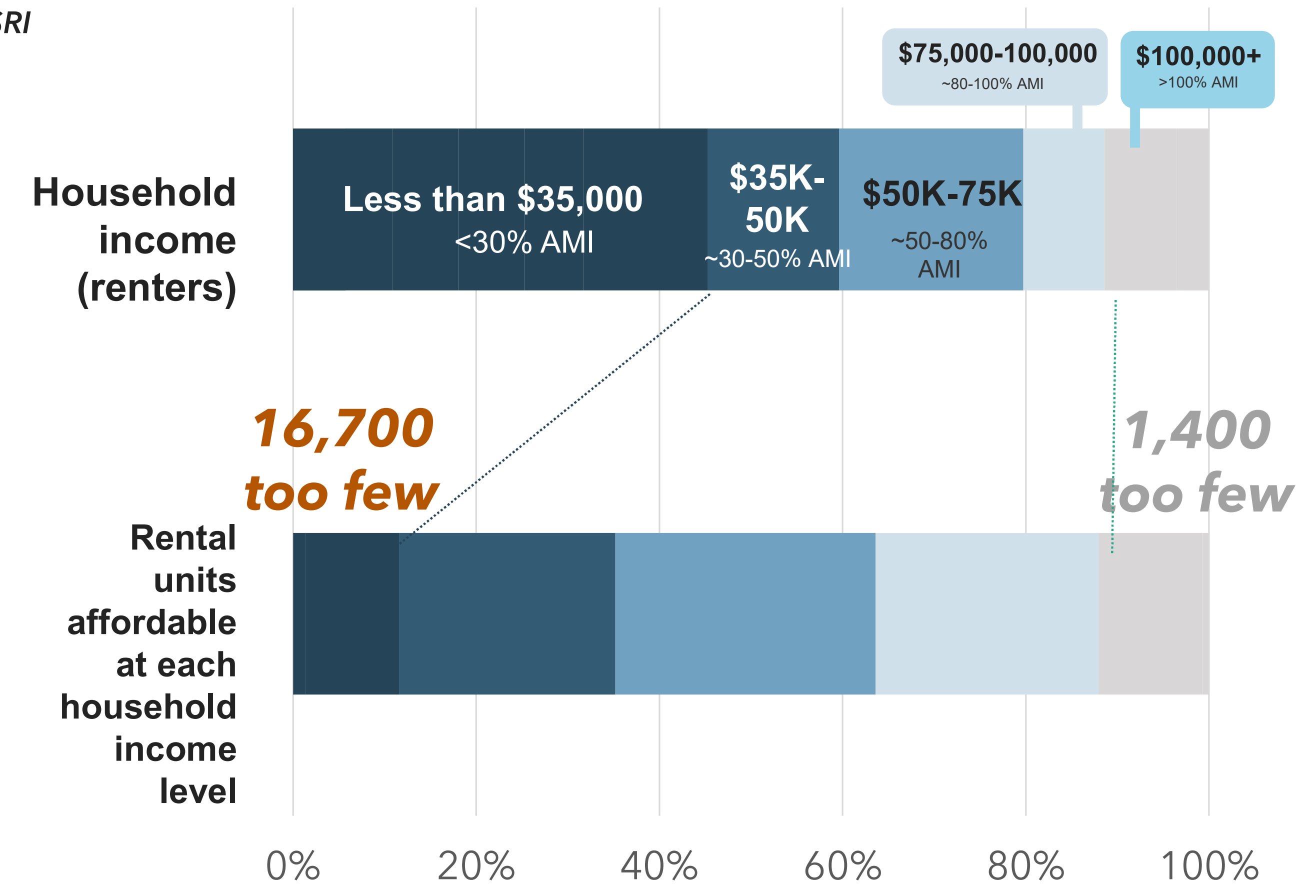
**Land in closer proximity to jobs is not fully saturated:** Suburban development is occurring in the northernmost portions of the southern counties at the limit for commutes to jobs. Available land in the northern counties is being prioritized by market developers.

**Exceptions exist:** Carrollton is generating manufacturing jobs, but workforce and middle income housing is lacking. Development of workforce housing near Carrollton seems like a market possibility and could increase available labor supply.

# Housing Gap (Rental)

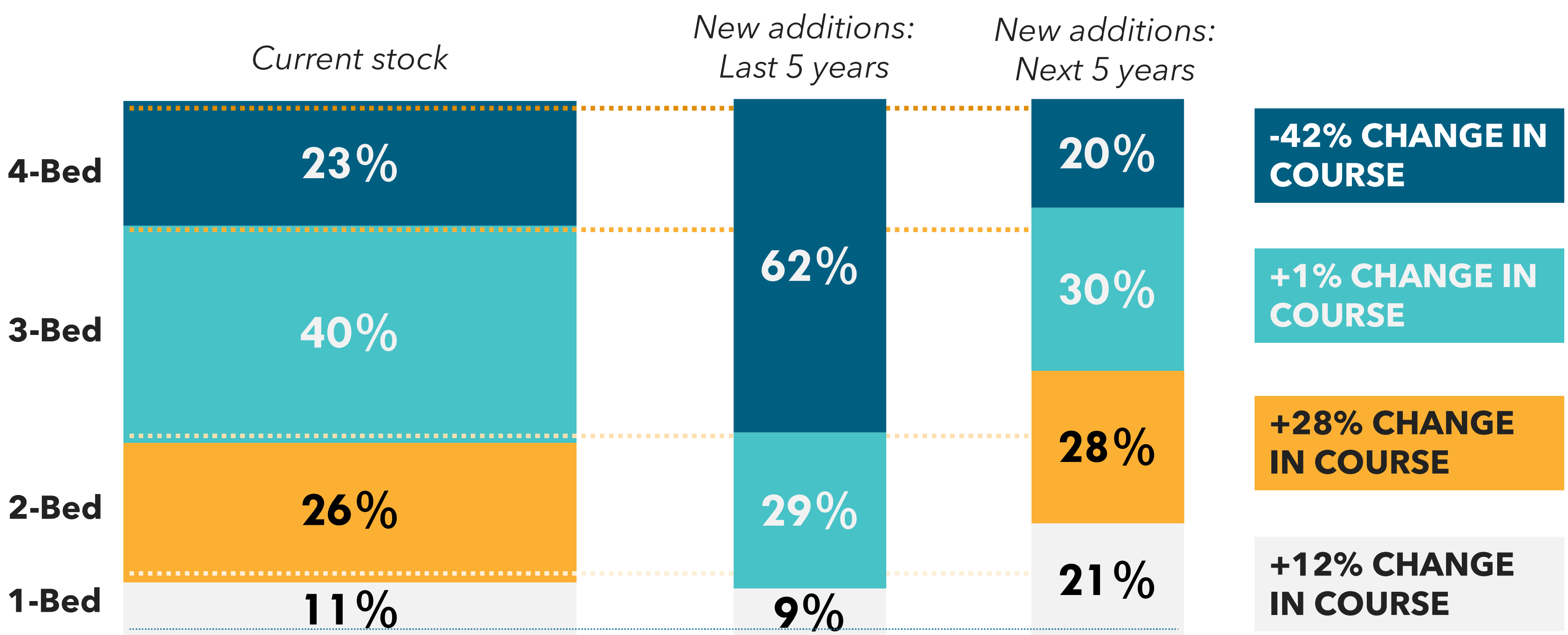
## Renter household incomes versus rental units at aligned prices

*Source: ACS, ESRI*



## Housing Gap (Variety of Unit Sizes)

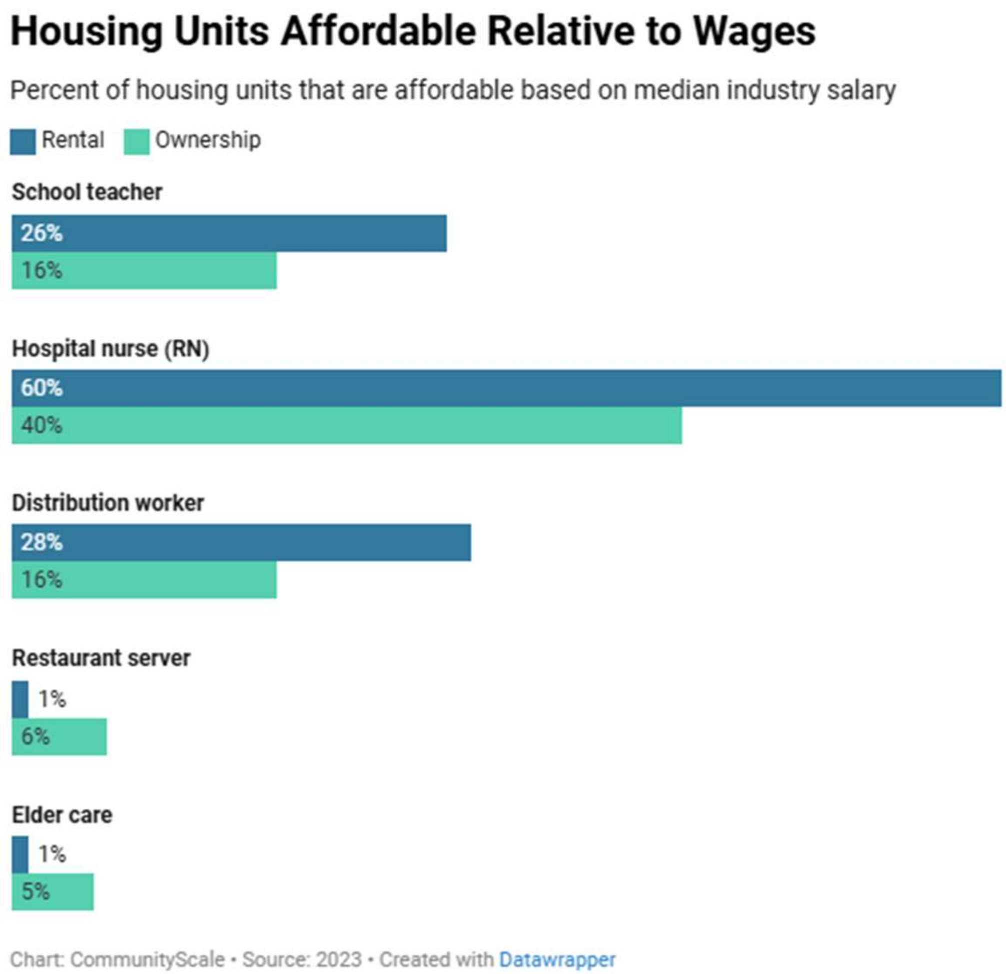
**This course correction would bring future development more in line with the overall current housing stock**




Source: ACS, Stantec analysis

# Housing Gap (Cost)

## NKADD's economic engine is producing jobs but not an aligned housing stock



# STUDY FINDINGS

**The NKADD region needs to build 6,650 housing units to support economic development in the next 5 years,** that's 1,330 units per year.

Included in target for new units would be at least:

- 3,260 units for workforce households ($15 - $25/hour)
- 4,220 one- and two-bedroom units
- 500 units for very low-income households (monthly <$320)

# TWO-PART COMMUNITY ENGAGEMENT STRATEGY

**What should we do about these gaps we identified?**

# partners


Elected Officials
Employers
Developers
Builders
Economic Development
Realtors
Landlords
Social Services
Planners
Financial Institutions
Residents

# COALITION COMMITTEES LED BY RESPECTED LOCAL LEADERS

- Steering Committee
- Retaining Existing Income-Aligned Housing
- New Development
- Policy and Finance
- Awareness & Community Engagement

# HOUSING COALITION

| Partners | Teams | Meetings |
| --- | --- | --- |
| 90+ | 5 | Close to 100 |

# PARTNERSHIPS + STAKEHOLDERS



FOREWORD

## Acknowledgements

This work would not have been possible without the active participation of representatives from local government, nonprofit organizations, private sector leaders, and community advocates from across our eight-county region. Collaboration of dedicated stakeholders from urban, suburban and rural communities ensured a holistic and regionally-coordinated approach to addressing housing challenges, with a shared commitment to creating actionable strategies that support housing affordability, availability, and income alignment as key drivers of workforce and economic development.

Adkins, Matt, Kentucky I-71 Economic Development Alliance
Allen, Damon, Federal Home Loan Bank of Cincinnati
Amrine, Daney, Welcome House
Aubuchon, Mayor Julie, City of Florence
Baker, Kristen, LISC
Barr, Hailey, United Way of Greater Cincinnati
Bates, Ellen, Brighton Center and Brighton Properties
Boyer, Shannan, Scooter Media
Brookbank, Sarah, Scooter Media
Cooper, Brent, NKY Chamber of Commerce
Costello, Kevin, Boone County Planning Commission
Crowley, Pat, Greater Cincinnati Northern Kentucky Apartment Association
Cutter, Seth, CVG Airport
Diaz, Lewis, Dinsmore
Dickerson, Veronica, Northern Kentucky Association of Realtors
Diallo, Boubacar, Boone County Fiscal Court
Douglas, Cate, Center for Great Neighborhoods
Douthat, Gina, Transit Authority of Northern Kentucky
Dusing, Matt, Carroll County Community Development Corporation
Elberfeld, Matt, Campbell County Fiscal Court
Fields, Judge/Executive David, Pendleton County Fiscal Court
Figueroa, Dr. Fernando, Gateway Community and Technical College
Finch, Jason, Fischer Homes
Folkerth, Megan, Interact for Health
Frew, Pat, Covington Business Council
Goddard, Chris, Catholic Charities
Grayson, Nancy, Horizon Community Funds of Northern Kentucky
Greco, Devon, BE-NKY Growth Partnership
Guidugli, Tom, Sr., Neighborhood Foundations
Hall Sommer, Melissa, Brighton Center and Brighton Properties
Hunt, Joshua, City of Florence
Johnson-Noem, Tara, Northern Kentucky Area Development District
Kirkpatrick, Katie Jo, Northern Kentucky Area Development District
Klare, Joe, Catalytic Fund
Knochelmann, Judge/Executive Kris, Kenton County Fiscal Court
Kenat, Steve, SHP
King, Edwin, City of Ft Mitchell
Kreutzjans, Bill, Jr., Ashley Building Group
Kreutzjans, Ross, Kreutzjans Construction
LeCount, Jenna, Boone County Planning Commission
Levermann, Jack, Paul Hemmer Companies
Long, Marlo, Truist
McAleese, David, BE-NKY Growth Partnership
Miller, Brian, Building Industry Association of Northern Kentucky
Minter, Cindy, Campbell County Planning & Zoning
Mize, Jean, RC Durr Foundation
Moneypenny, Andrea, Model Group
Moore, Judge/Executive Gary, Boone County Fiscal Court
Muth, Ken, Duke Energy
Pendery, Judge/Executive Steve, Campbell County Fiscal Court
Peters, Amanda, Northern Kentucky Office of Drug Control Policy
Pleiman, Laura, Boone County Fiscal Court
Radwanski, Commissioner Mike, City of Newport
Ratterman, Shannon, Center for Great Neighborhoods
Reddy, Sharmili, Planning & Development Services of Kenton County
Salzman, Council Member Ryan, City of Bellevue
Sand, Jenny, Northern Kentucky University
Session, Chuck, United Way of Greater Cincinnati
Simpson, Colton, Grant County Fiscal Court
Stanton, John, Kenton County Fiscal Court
Steffen, Brian, City of Newport
Stiene, Stephanie, Brighton Center and Brighton Properties
Taylor, Ben, Drees Homes
Watkins, Tyler, Work Architecture
Webb, Kim, Emergency Shelter of Northern Kentucky
Wilson, Janie, Northern Kentucky Association of Realtors
Wilson, Tami, Northern Kentucky Chamber of Commerce
Winkler, Wonda, Brighton Center and Brighton Properties
Zengel, Karen, St. Vincent De Paul

### Dedication

In honor of Pat Crowley (1961-2024), a friend to all who had the good fortune to meet him. Pat supported the team and the work that led to this report as a committee chair, a steering committee member, an advocate, a mentor and a friend. He will be greatly missed.

# COMMUNITY ENGAGEMENT

Presentations
36

Data Walks
12

Resident Input
Over 700

# COMMUNITY ENGAGEMENT

## Sharing the Housing Study Data

### Community Outreach and Presentations

- NKADD - 36 presentations
- Numerous community groups; hundreds in attendance

### Data Walks

- Open to anyone; sought a diverse group
- Focus on those making $15 - $25/hour

### Surveys

- Similar to Data Walk questions
- Website – NKADD, then housingNKY.org

# COMMUNITY'S RESPONSE

Data Walk attendees were asked to compare their own experience with housing with the findings from the Housing Study and identified their wishes for the housing market in Northern Kentucky.

Housing for adults who are downsizing

More 1 and 2 bedroom units

Priority for 1st time homebuyers

Housing closer to where they work

More landlords who accept Housing Choice Vouchers

Information about housing availability

Access to transportation


Home for All
NKADD


WINTER WEATHER ADVISORY
HIGHLAND
WCPO 9 NEWS
NORTHERN KENTUCKY HOUSING SHORTAGE
LEADERS SHARE POSSIBLE SOLUTIONS TO BUILD MORE HOUSING
6:07
23°
WCPO
0:54 / 1:52


WINTER WEATHER ADVISORY
FRANKLIN
Local
01. Proactive Code Enforcement
02. Short-Term Rental Partnerships
03. Nonprofit Property Acquisition
04. Expedited Permitting Process
07. Property Assessment Deferral
16. Local Resources for Homeownership
23. Missing Middle Housing Strategy
24. Creative Zoning and Regulations
25. Reduced Parking Requirements
26. Form-Based Zoning
27. Accessory Dwelling Units(ADUs)
28. Streamlined Approval Process
29. Housing Incentives
37. Adaptive Reuse
38. Tax Incentive Strategies
State
06. Energy Code Cost Review
17. Low-Income Housing Credits
18. Utility Assistance Expansion
22. Project-based Housing Choice Vouchers
32. Update the Kentucky Affordable Housing Trust Fund
34. Community Investment Credit
40. Kentucky Housing Corporation Advocacy
41. Community Development Block Grants (CDBG)
42. Transportation Project Review Coordination
43. Traffic Count Efficiency
Regional and nonprofit
05. Building Technology Innovation
08. Stakeholder Idea Sharing
09. Landlord Property Inventory
10. Public Input
11. Section 8 Awareness Campaign
12. Community Engagement
13. Performance Indicator Tracking
30. Regional Housing Trust Fund
31. Development Cost Support
35. Innovative Housing Pilots
36. Local Capacity Leveraging
46. Utility Connection Assistance
47. Small Developer Support
Any type of lead partner
14. First-Time Homeownership Support
15. Homeowner Downsizing Assistance
19. Landlord Participation Incentives
20. Tenant-Landlord Risk Mitigation
39. Public Land Allocation
48. Construction Trade Immigration
49. Construction Training Funding
Federal
21. Family Self-Sufficiency Program (HUD)
33. HOME Fund Allocation
50. Apprenticeship Program Enhancement
WCPO 9 NEWS
NORTHERN KENTUCKY HOUSING SHORTAGE
LEADERS SHARE POSSIBLE SOLUTIONS TO BUILD MORE HOUSING
6:07
23°
WCPO
0:36 / 1:52

EXECUTIVE SUMMARY

# Income-aligned housing keeps our community strong

| Essential workers | Young adults | Downsizing seniors |
|---|---|---|
| "One of my favorite parts of being a firefighter used to be spending time at the station with my fellow firefighters. But none of us live near enough to the station anymore so it's too far for us all to go there when we're not on duty." | "I graduated from college in May and was really excited to start my new job and move out of my parents' house. I'm going to have to spend a few years saving up instead because staying in Northern Kentucky is out of my price range." | "I'm living on Social Security and would love an apartment in an active community. We're looking at apartments in walking neighborhoods since we won't be driving forever, but they are all too expensive for us." |
| One or two earners at $45K/year each | Typically earning $11.00/hour | Still earning or on fixed income |
| Typical attainability is $1,150 per month | Up to $500 a month on rent each | Range of attainability $550 - $1,850 |
| Needs two or more bedroom home | Studio or apartment with roommates | Needs one or two bedroom home |

*Note: The quotes are from feedback collected from NKY residents, but are not related to the photos.*

# THE RACE TO FIX NORTHERN KENTUCKY'S HOUSING GAP

Strong job creation resulted in demand for affordable homes far outpacing supply

**BY BRIAN PLANALP**
bplanalp@bizjournals.com

Chris Reinersman sat in the living room of an Independence home over the summer to make the case he had been making for months. The atmosphere was tense and crowded, but as he spoke, people listened.

The proposal from Fischer Homes for 110 new condominiums off two-lane Madison Pike surfaced in February before a city planning commission that would eventually vote against it. Reinersman, the city's mayor and a private real estate appraiser, argued for the proposal in a March City Council meeting – and faced significant public pushback.

Independence is one of the fastest-growing cities in Northern Kentucky. It hasn't gone unnoticed among longtime residents. Signs appeared across the city before the March meeting encouraging people to attend and speak against the Madison Pike project. Another room tense and crowded with opinions. Those who spoke described a place where residential density doesn't belong and whose growth is outpacing its traffic grid.

*Chris Reinersman, mayor of Independence*

"We're the heart of Kenton County, and our heart is getting congested," said one resident. Another, citing traffic concerns, warned of Independence suddenly becoming Los Angeles.

Months later, in that Independence living room, Reinersman patiently pressed his points again. Development costs were too high to support a single-family subdivision. In any case, the land was already zoned for multifamily. At least the Fischer Homes project needed city approval, which gave the city some control over the outcome. If it failed to move forward, another developer likely wouldn't create owner-occupied condos, but three-story apartments.

Not exactly a blow for progress, as arguments go – but it won the people in the room, and months later the development advanced through City Council without a detractor in sight.

"Education, education, education – that's my watchword on these things," Reinersman said. "There were a lot of changed minds in that living room. We can't be afraid to get out in front of the torches and the pitchforks."

Reinersman recalled the story at a November event updating local officials and business leaders on the progress of the Northern Kentucky Area Development District's housing study. The 280-page report released last September found the eight-county region's job creation is outpacing its housing availability, an unsurprising result to any who've tried their luck on Zillow in the last two years. Speakers at the event drove home the larger point: Housing is a workforce issue, and Northern Kentucky, despite a run of good form, is in danger of suffocating its own growth.

"If we don't make these hard decisions, Northern Kentucky is not going to be a place you want to live," Brian Miller, executive vice president of the Building Industry Association of Northern Kentucky, said at the housing event. "It's going to be a good thing we have great airfare, because you're going to be getting on a plane to see your grandchildren someday."

The housing study showed Northern Kentucky needs to create 6,650 additional residential units beyond what's currently in the pipeline to support continued economic growth through 2028. It also showed the region's existing housing market is significantly misaligned with respect to income and housing typology. Northern Kentucky does a good job of building "McMansions," as Boone County Judge/Executive Gary Moore described them, but not one- and two-bedroom homes and apartments, which are exactly what the region needs most. Two-thirds of Northern Kentucky's job growth over the next decade is expected to come from jobs earning an average annual salary below $60,000, according to the housing study.

> **Lack of affordability and the missing middle are holding our region back. That is undisputed in all the conversations we're having."**
>
> Brent Cooper, executive director of the Northern Kentucky Chamber of Commerce

Compounding the problem, homeowners are staying in their homes on average 13 years, twice as long as they did in 2005. That's a direct result of high mortgage rates – and scarcity of options. Retirees often want to downsize in the community where they've lived most of their lives, but local communities don't have that sort of low-maintenance housing stock in abundance.

Nor does building new single-family communities price out as favorably as it once did. Boone County alone has 4,300 lots platted for single-family homes where nothing is happening. Construction and land costs have forced developers to try for denser designs, sending them into the buzzsaw of public comment, where restrictive zoning and building codes provide the cudgel simple rancor does not.

"This industry dies by a thousand cuts," Miller said at the housing event. Planning commissioners are well-intentioned, he continued, but every additional berm and tree required of developers is passed onto the buyer, which reduces housing production.

With fewer new-build options, buyers in 2023 flooded into existing homes, the supply of which is fixed, so prices naturally skyrocketed, and uncounted local families were pushed to the sidelines. The result even today is a housing market snared in an encumbering ouroboros, where the next generation can't buy because the former can't sell and the CEO has trouble hiring because there is little income-aligned housing within a reasonable driving radius – 20 minutes, by some accounts.

"There isn't any debate in the business community that this is a top issue," said Brent Cooper, executive director of the Northern Kentucky Chamber of Commerce. "Lack of affordability and the missing middle are holding our region back. That is undisputed in all the conversations we're having."

The alarm bells are ringing far and wide. Florence Mayor Julie Metzger Aubuchon said never in her decades of public service has she seen this level of concern about a single topic from so many organizations. Wendy Smith, deputy executive director of housing programs for the Kentucky Housing Corp., noted it's the first time homeless shelters and real estate developers are talking the same language about the same problem. "People are ready to have these conversations," Colton Simpson, deputy judge/executive of Grant County, said.

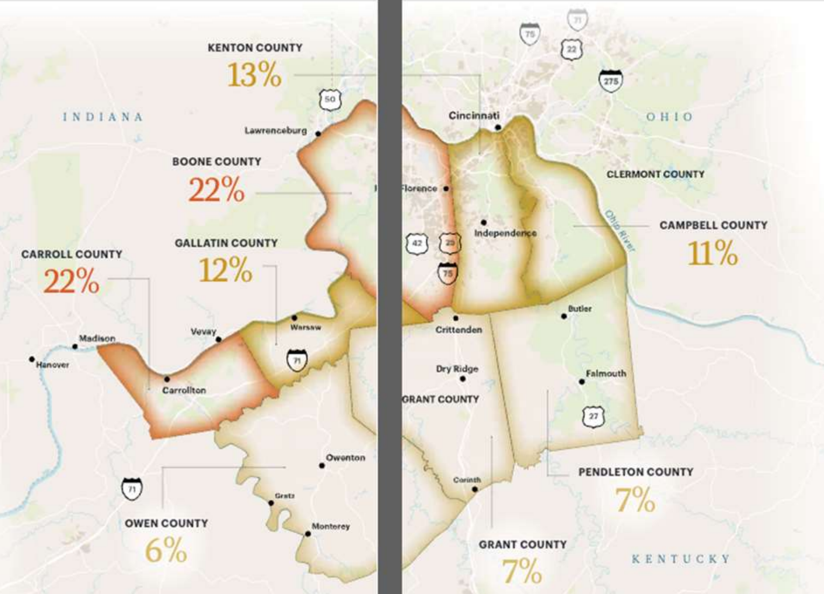
Recommendations intended to close the region's housing gap are due out in late December from working groups assembled by the Northern Kentucky Area Development District drawing from the housing study's findings. The idea, according to multiple officials, is to offer a "menu" of options for communities to consider: density bonuses, for example, or a housing bond fund.

"This is a collective effort. It's not a one-size-fits all," Moore said. "Each community has an individual tolerance for different options. What works for one isn't right for another."

Boone County is ground zero for both problem and solution. It's the fastest-growing county in the commonwealth, with 4.4% population growth since 2020, thanks to flat land and the jobs hub around Cincinnati/Northern Kentucky International Airport. It also has the largest current deficit of housing units as a share of total inventory, according to the Kentucky Housing Corp. The county right now needs to build 11,350 homes and apartments to accommodate current demand.

Its record on dense housing developments remains mixed. The county touts a pipeline of multifamily units in the thousands, but the Boone County Fiscal Court has rejected at

*CONTINUED ON PAGE 12*




**HOUSING DEFICIT**

A recent housing study of Northern Kentucky shows the region needs thousands of homes, with Boone County facing the greatest shortage.

| County | Boone | Campbell | Carroll | Gallatin | Grant | Kenton | Owen | Pendleton |
|---|---|---|---|---|---|---|---|---|
| Ratio of units needed to total households | 22% | 11% | 22% | 12% | 7% | 13% | 6% | 7% |
| Population | 141,920 | 94,158 | 10,779 | 8,706 | 25,300 | 172,204 | 11,239 | 14,529 |
| Total households | 51,427 | 39,291 | 4,088 | 3,210 | 9,157 | 69,271 | 4,360 | 5,526 |
| Total units needed | 11,350 | 4,194 | 884 | 394 | 642 | 9,157 | 244 | 407 |

SOURCE: KENTUCKY HOUSING SUPPLY GAP STUDY
MAPCREATOR.IO/OSM AND JOHN LAUER | CBC

# HIGHLIGHTS: HOME FOR ALL NKY HOUSING STRATEGIES

**It's not a plan …**

HOME FOR ALL

Top | Download | Overview | Menu of Strategies | Housing Data

# Home for All
# Northern Kentucky Housing Strategies

This project was coordinated by the Northern Kentucky Area Development District with Brighton Center and Brighton Properties. The project was funded by Interact for Health and United Way of Greater Cincinnati. Communication support was provided by NKY Chamber of Commerce through Scooter Media. CommunityScale supported the menu of strategies and documentation.

Download HOME FOR ALL

## Foreword

When I was young, I remember asking my father, a home builder, if we'd ever run out of room to build houses. He assured me Northern Kentucky had plenty of space. Today we still have enough space to build homes, but how can we

This document presents a menu of strategies for local governments, nonprofits, philanthropic organizations, and private employers to consider. It doesn't recommend uniform application but offers diverse strategies to address housing

- Address and prevent neighborhood blight
- Building permits and inspections
- Enhance communication and awareness
- Community engagement
- Homeownership assistance programs
- Public housing effectiveness
- Planning and zoning
- Tools and incentives
- Transportation and infrastructure
- Workforce development

# WHAT DOES YOUR COMMUNITY NEED?

More homes? More rentals?

More homeownership?

Rehab older homes?

More price options?

Do you want to keep your older adults and help them downsize?

Do you want to attract younger families?

# 2025 COALITION UPDATES

- Work toward Housing Fund – ongoing partnership
- Establishing key metrics – ongoing partnership
- Monitoring Kentucky General Assembly Housing Taskforce
- Tracking housing successes across the region
- Technical assistance for local communities – ongoing
- Support for local initiatives

# LOCAL WINS

**Carroll County:**

County leadership and local community development partners have worked to:

1. Identify potential sites for residential development

2. Streamline permitting with KYTC

3. Identify funding sources to offset infrastructure costs

4. Support local groups to secure funding to support residential development

**12. Community Engagement**

Continue to engage key stakeholders and the public in Northern Kentucky to ensure housing market conditions as well as existing resources, innovative development opportunities and strategies are known and understood.

**47. Small Developer Support**

Support existing and increase the number of small residential developers in the Northern Kentucky housing industry in order to encourage a wider variety of housing types and price points (see page 38 for details).

# LOCAL WINS

**Boone, Cambell, Kenton Counties:**

Building Industry Association's Enzweiler Building Institute working toward securing funding through both federal EDA and state Education and Labor Cabinet to advance construction trades training.

City of Covington launches Housing Taskforce with participation from NKADD, local business leaders, and other key stakeholders.

Northern Kentucky Chamber releases NKY Housing Blueprint prioritizing key strategies from Home For All report.

### 36. Local Capacity Leveraging

Leverage existing local capacity to promote and advance income-aligned housing goals through organizations such as nonprofit developers, NKY Port Authority, Catalytic Fund, and others.

### 49. Construction Training Funding

Enhance existing funding for construction and trades training through creation of additional funding for construction workforce training.

### 16. Local Resources for Homeownership

Establish locally funded and managed resources for homeownership – that could encourage and incentivize the purchase or renovation of properties (single and multi-family) that could preserve affordability, stabilize rents and lead families toward home ownership.

# LOCAL POLICY OPPORTUNITIES

## Recent Campbell County Initiatives

- **Parking** – Bellevue and Dayton have downsized their parking ratios. (This is helping increase investment in the Central Business District, including historic areas)

- **Multi-Family** – Woodlawn has added and Silver Grove is planning to a multifamily zone. (We are seeing increased land interest as a result)

- **Accessory Dwellings** – Southgate has added ADU in their largest single family zone. Unincorporated Campbell County now allows ADU in the Rural Residential Estate and Agricultural zones. (This is helping with aging in place in both areas)

- **Attached Units** – Dayton now allows attached single-family units in their largest single-family zone. (This is helping with density and cost. We have new attached homes now under construction)

- **Training** for local Planning and Zoning and Board of Adjustments members – familiarize them with new housing product and techniques.

# REGIONAL WINS

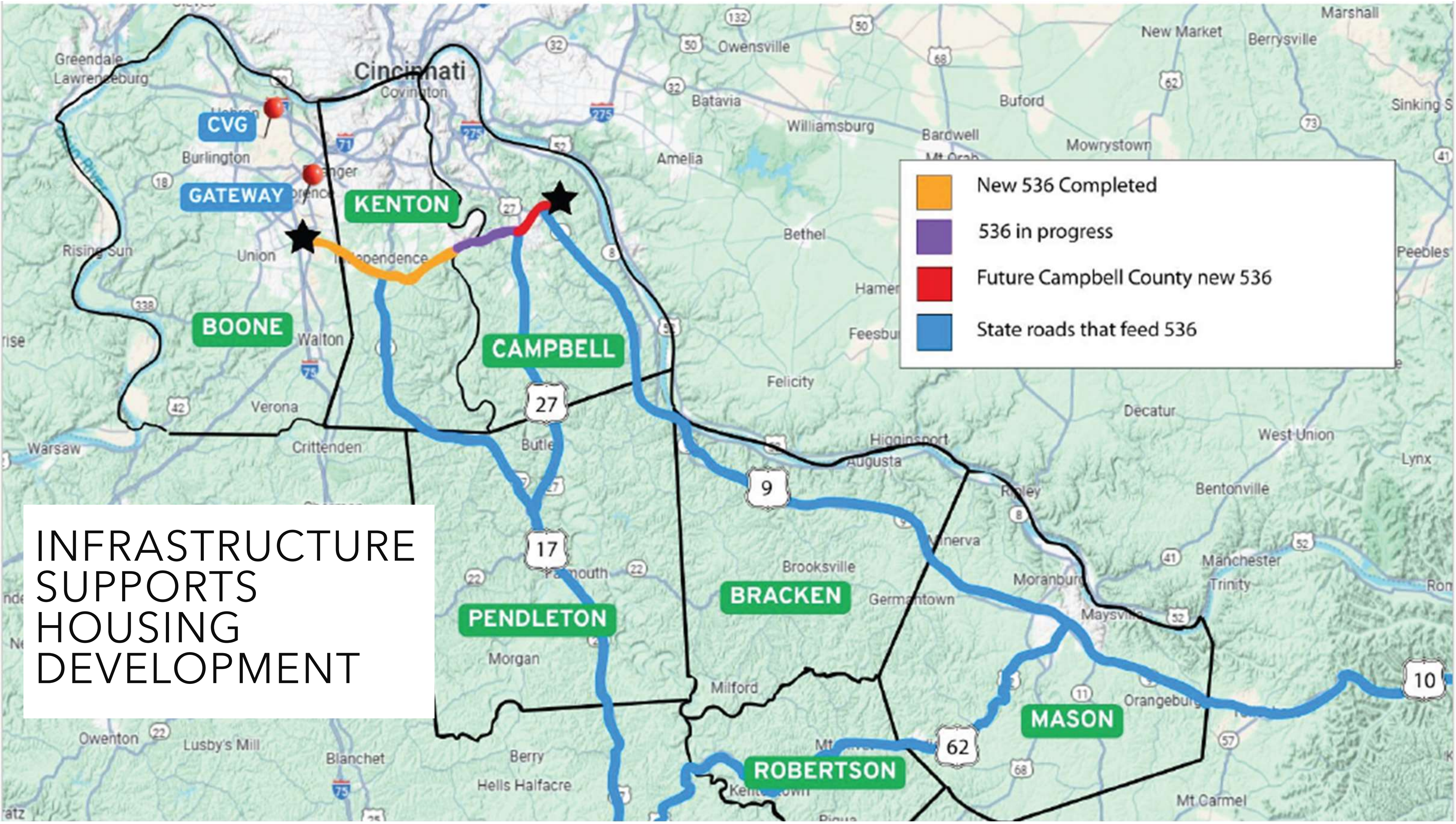
NKADD staff support local planning commissions and fiscal court staff in updating data to determine progress in filling housing gaps with a data dashboard.

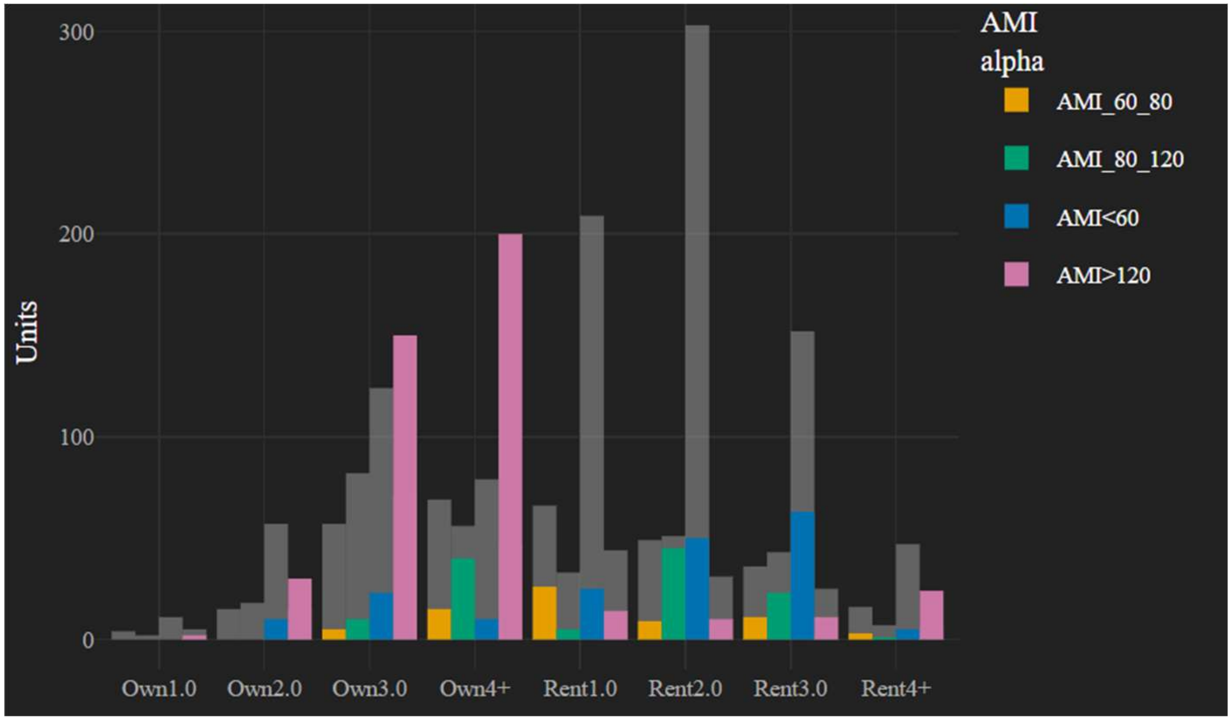
Key partners are engaged in conversations to move forward with development of regional housing fund.

**36. Local Capacity Leveraging**
Leverage existing local capacity to promote and advance income-aligned housing goals through organizations such as nonprofit developers, NKY Port Authority, Catalytic Fund, and others.

**30. Regional Housing Trust Fund**
Establish a flexible source of financing to serve the region as a Housing Trust Fund that could offer gap financing through grants, low/no interest debt, or forgivable loans and/or provide funding for maintaining low to moderate income housing product and support new development. (See more details on page 36).

# INFRASTRUCTURE SUPPORTS HOUSING DEVELOPMENT






# TRACK METRICS & SUCCESSES

How do you turn a project into a system?

- Measure change!
  - Supply and affordability
- Assign responsibility for moving metrics forward!

# Home for All

Northern Kentucky Housing Strategies

HousingNKY.org

NKADD
NORTHERN KENTUCKY AREA DEVELOPMENT DISTRICT

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