



MEMORANDUM

Agenda Item # 65

Date: August 5, 2015
To: Metropolitan Planning Commission
From: Gerald Green, Executive Director
Prepared By: Jeff Archer, Principal Planner
Subject: **Report to City Council on alternative financial services and related zoning options**

On December 9, 2014 Knoxville City Council approved resolution R-428-2014 titled “A Resolution of the Council of the City of Knoxville respectfully requesting that the Metropolitan Planning Commission consider and make a recommendation to City Council regarding the possible limitation of alternative financial establishments to the zoning regulation definitions and to potentially regulating the clustering of same.” In response to this request, MPC has attached a report that included an analysis and recommendations for regulating Alternative Financial Services (AFS) through the zoning ordinance.

The report gives an overview of AFS businesses, includes how these establishments are regulated at the state and local level, and includes a spatial analysis of the existing locations within Knoxville. The report concludes with two options; (1) developing a spacing standard in the zoning ordinance and (2) taking no action.

The report recommends specific changes that need to take place in order to adopt spacing standards in the zoning ordinance. The spacing standard recommended is 1,000 foot separation from like businesses and 1,000 foot from residentially zoned properties. Other zoning changes recommended include adding a definition and listing AFS uses under the “uses permitted on review” section of C-3, C-4, and C-6. These uses would also be allowed in the planned districts where they occur today, including SC-1, SC-2, SC-3, and PC-1. AFS establishments would not be permitted as a use by right or a use on review in any other zoning district.

Adopting these standards would result in 74 of the 81 existing businesses being legal non-conforming. Given our current zoning pattern this would leave 207 eligible parcels (225 acres) where new AFS businesses could locate.

If you have any questions, please feel free to contact me by email at gerald.green@knoxmpc.org or phone at 215-3758. If you have more detailed questions about the report you may want to contact Jeff Archer, who served as the project leader for this report, by email at jeff.archer@knoxmpc.org or by phone at 215-3821.



RESOLUTION R-428-2014 ANALYSIS AND RECOMMENDATIONS:

**Research of Alternative Financial Services (AFS)
And
Evaluation of Related Zoning Options**

July 29, 2015

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SUMMARY

Metropolitan Planning Commission staff has reviewed Resolution R-428-2014 received from the Knoxville City Council, related to alternative financial services (AFS's). In this report, MPC staff has provided options for defining AFS's and subcategories of AFS's, and provides possible zoning options available to regulate the clustering of AFS's. Because alternative financial establishments are currently the subject of considerable national attention, particularly in regard to "Payday Lenders," MPC staff has also provided recently published information that may be helpful as the City considers local control options.

CITY COUNCIL REQUEST

On December 9, 2014, the Knoxville City Council approved Resolution R-428-2014 titled "*A Resolution of the Council of the City of Knoxville respectfully requesting that the Metropolitan Planning Commission consider and make a recommendation to City Council regarding the possible limitation of alternative financial establishments to the zoning regulation definitions and to potentially regulating the clustering of same.*"

Resolution R-428-2014 asks for the following:

- Definition of the term "Alternative Financial Establishments," or AFS's
- Study of the possibility of developing clustering limits for these establishments

The public interests involved in limiting clusters of AFS's are identified as (1) potential benefits associated with economic redevelopment of commercial corridors, and (2) lessening potential negative impacts on the City's residents.

OVERVIEW OF ALTERNATIVE FINANCIAL SERVICES (AFS) REGULATIONS

In the last decade, many cities have created zoning ordinances designed to limit the concentration of alternative financial services (AFS) businesses such as check-cashing outlets, money transmitters, car title lenders, payday loan stores, pawnshops, and rent-to-own stores. Proponents for local laws contend that these businesses have been expanding at a rate that is troublesome. The abundance of payday lenders in certain communities is due, some argue, to a "spatial void" left by banks and credit unions that have departed from middle- and low-income neighborhoods. The high fees associated with using AFS, they are alleged to trap consumers in a cycle of debt and dependency from which it is difficult to emerge.

Although the research on the consumer-welfare impacts of AFS lending is mixed, many city leaders believe that alternative lenders do more harm than good in their communities. As such, recently passed zoning ordinances are designed to break up existing payday-lender agglomeration and to curb the concentration of new payday lenders. They do so by prohibiting the location of any new payday-lending business within close distance of another payday lender and often within close distance of residential zones. Controlling the spacing and as a result the concentration of these uses is called "anti-agglomeration" zoning.

Cities have authority to regulate the location and operation of AFS businesses within their boundaries. The Supreme Court's opinion in *Village of Euclid, Ohio v. Ambler Realty Co.* established the general principle that zoning restrictions can legitimately be designed to protect the public safety, health, and welfare of residents. This "public welfare" justification is broad enough to impose few limits on a local government's zoning authority, particularly the authority to exclude, separate, or limit particular types of land uses deemed harmful in some way to the local community. For a long time, local governments have limited the siting of controversial retail commercial establishments—including pawn shops and adult businesses—to protect their citizens and community character from the negative spillovers associated with these controversial land uses. Although the primary impetus

motivating many of these ordinances is to shield economically vulnerable residents from payday lenders, there is little doubt these ordinances fall within the broad “public welfare” rationale of the Euclid ruling.

Many research documents raise the question of the relationship between land-use controls and consumer protection, or welfare. Land-use scholars have long ruled as fact that there is a relationship between zoning and consumer welfare by recognizing the ways that zoning protects homeowners from declining home values. Zoning that separates or excludes less desirable land uses (and less desirable residents) from residential neighborhoods also protects a homeowner—i.e., the value placed on the home that lies above and beyond its market value.

On the flip side of exclusionary zoning, however, is concentration. Classic Euclidean zoning not only separates and excludes incompatible land uses from residential areas, but also forces together compatible land uses into their own zones—e.g., commercial and industrial zones. This is why payday lenders and other AFS providers are typically located in retail-zone clusters, usually strip malls or heavily traveled commercial thoroughfares, as either stand-alone storefronts or co-operating with another retail business. Moreover, just as exclusion can generate both positive and negative spillovers beyond the boundaries of a particular piece of property, so too can concentration generate negative and positive spillovers.

As economists have written in extensive literature on agglomeration economies, the spatial concentration of certain industries can give rise to economies of scale, which result in supply- and demand-side positive agglomeration externalities. These benefits can be captured on the supply side by retail firms that concentrate in commercial clusters and on the demand side by both firms and retail consumers engaged in comparison shopping. Zoning restrictions that force firms to locate close to their rivals can generate demand-side benefits for consumers by reducing their search costs and incentivizing firms to compete on price and greater product and format variety.

Some research states that there is a correlation between zoning and retail firm proximity, arguing that zoning restrictions that limit or prevent firm agglomeration can increase search costs and reduce the incentives for competition between retail firms. As a result, zoning limitations that restrict business location and density may deprive consumers of the agglomeration benefits that competition between proximate firms can provide.

If the primary impetus behind anti-agglomeration zoning measures is to protect local residents from the lending practices associated with the payday lending industry, and therefore to improve consumer welfare, it might be that these measures are working against their intended purpose. This is particularly so if the competition that results from firm agglomeration would benefit consumers in the absence of more stringent federal or state financial regulation. That is, if market competition has the potential to discipline lenders through agglomeration economies, then anti-agglomerative measures might be harming consumers who lack viable financial services alternatives. This is not to say that zoning controls cannot play a role in striking the right balance between reducing or limiting the negative externalities that might be associated with some kinds of retail agglomerations and the positive benefits that such agglomerations generate, especially for consumers.

Some research examines the link between AFS lending and consumer welfare and argues that land-use ordinances aimed at regulating this industry are an attempt, in part, to fill a spatial and regulatory void that has resulted in the proliferation of payday lenders in certain communities.

FUTURE ISSUES

Innovation is constant across AFS, and many products, processes, and technologies are emerging that could significantly transform this sector, including expansion of cellular (mobile) phone financial services and person-to-person (P2P) lending. In addition, on March 26, 2015, the federal agency the Consumer Financial Protection Bureau (CFPB) announced it is considering proposing rules that would end payday debt traps by requiring lenders to take steps to make sure consumers can repay their loans. However, any new regulations are still quite a long way from being implemented. The CFPB will first have to consult a special “Small Business Panel,” co-run by

the Small Business Administration, which will give lenders themselves a chance to weigh in. After that time, CFPC will develop a report for public review.

REGULATIONS IN TENNESSEE

Tennessee is one of thirty-six states that allow payday loans. The state issues licenses for title pledgers, deferred payment services, and check cashers. The County Clerk's office issues licenses for pawnbrokers. These types of AFS are defined in Tennessee Code Annotated, and the definitions and licensing requirements are as follows:

Check Cashers

Definition: The activities of check cashing companies are governed by the "Check Cashing Act of 1997" ("Act") codified as T.C.A. Title 45, Chapter 18. A "check casher" is a person who, for compensation, provides currency in exchange for a payment instrument received (a "check"). Retailers who cash checks incidental to their retail operations are exempt from the Act under T.C.A. § 45-18-103(3), if the compensation for cashing checks does not exceed five percent (5%) of the gross receipts from the retail sale of goods or services.

Licensing: To obtain a check cashing license, an applicant must maintain a minimum net worth of \$25,000 per location and demonstrate experience, character, and general fitness to command the confidence of the public and warrant the belief that the applicant will operate its business lawfully and fairly. Licensing is administered through Tennessee's Department of Financial Institutions.

Deferred Presentment Service Companies (Payday Loan Establishments)

Definition: The activities of deferred presentment services companies are governed by the "Deferred Presentment Services Act" codified as T.C.A. Title 45, Chapter 17. "Deferred Presentment Services" is defined to mean a transaction pursuant to a written agreement involving the following combination of activities in exchange for a fee: (a) accepting a check dated on the date it was written; and (b) holding the check for a period of time prior to presentment for payment or deposit.

The Act was amended by Public Chapter Number 205, effective May 20, 2011. Among other requirements of the amendment, the Act requires that all deferred presentment lenders be licensed regardless of the manner of service delivery including via the internet. Additionally "payment instrument" was defined to mean a check, draft, warrant, money order, traveler's check, or other instrument for payment of money, whether or not negotiable, and also includes any authorization for electronic payment of money.

Licensing: To obtain a deferred presentment services license, an applicant must maintain a minimum net worth of \$25,000 per location and demonstrate the financial responsibility, financial condition, business experience, character, and general fitness to reasonably warrant the belief that the applicant will operate its business lawfully and fairly. Licensing is administered through Tennessee's Department of Financial Institutions

Tennessee along with twenty-six other states, has permissive regulations for payday establishments that have Annual Percentage Rate (APR) of 391% or higher, Tennessee's rate is 459%. According to Tennessee law, the payday lender can charge \$15 per returned check or \$17.65 for every \$100 he loaned to the borrower. A person can only borrow up to \$500 at one time and cannot be charged more than one late fee per check. While Tennessee prohibits roll-overs, it does not prevent lenders from making a loan to a borrower on the same day that a prior loan is repaid. Licensing is administered through Tennessee's Department of Financial Institutions

Title Pledge Lenders

Definition: The activities of title pledge lenders are governed by the Tennessee Title Pledge Act codified as T.C.A. Title 45, Chapter 15. A “Title Pledge Lender” is any person engaged in the business of making a written title pledge agreement for a “fee,” whereby the lender agrees to make a loan of money to a customer in exchange for a security interest in the unencumbered title personal property owned by the customer (or “pledgor”). In Tennessee, the most common titled personal property pledge is an automobile. The pledgor has the exclusive right to redeem the certificate of title by repaying the loan in full, including fees and interest charges, according to the agreement. When the loan is paid off, the lender then releases the security interest in the titled personal property and returns the title to the customer. The title pledge agreements are initially written for a 30-day period but can be renewed for additional 30-day periods.

Licensing: To obtain a title pledge lender license, an applicant must maintain a minimum net worth of \$75,000 per location and demonstrate financial responsibility, financial condition, business experience, character, and general fitness to reasonable warrant the belief that the applicant will operate its business lawfully and fairly. Licensing is administered through Tennessee’s Department of Financial Institutions.

Pawnbroker

Definition: The activities of pawnbrokers are governed by the Tennessee Pawnbrokers Act of 1988 codified as T.C.A. Title 45, Chapter 6. Tenn. Code Ann. § 45-6-201. A "Pawnbroker" means any person, partnership or corporation engaged in the business of lending money on the security of pledged goods; or engaged in the business of purchasing tangible personal property on condition that it may be redeemed and repurchased by the seller for a fixed price within a fixed period of time; or engaged in the business of advancing money to a customer in consideration for the customer surrendering possession of tangible personal property on an agreement by which the property may be returned to the customer's possession on repayment of the money advanced; and engaged in the business of selling new and used tangible personal property, whether unredeemed tangible personal property resulting from a pawn transaction, or acquired by a purchase of tangible personal property not acquired in a pawn transaction or purchased merchandise for resale from dealers and traders.

Licensing: T.C.A. states it is unlawful for any person, firm, or corporation to establish or conduct a business of pawn broking unless the person, firm, or corporation has first procured a license to conduct the business in the manner and form as provided in this part. Licensing is administered through Knox County Clerk’s Office.

REGULATIONS IN OTHER TENNESSEE CITIES

While there are variations in ways that Tennessee cities (Chattanooga, Memphis, and Nashville) have addressed AFS, they all have opted for minimum distance requirements from each other and in some instances have established a minimum distance from residential property. Currently, the City of Knoxville does not address AFS establishments in its code of ordinances. In order to propose any new local control for AFS’s we wanted to examine what rules and regulations other Tennessee cities have in place. The following is a summary of how AFS establishments are controlled in Chattanooga, Memphis, and Nashville.

Chattanooga – In 2006, Chattanooga-Hamilton County Regional Planning Agency conducted a study, Alternative Financial Services: Chattanooga, Tennessee. This report examined trends for two specific issues (property value and crime rates) in relation to the location of alternative financial services. This report did not find a negative relationship between the location of study businesses crime rates. However, the rapid growth and concentration of alternative financial services in areas of Chattanooga may have impeded the appreciation of residential property values.

Following the completion of this study, an ordinance was proposed, but failed. In 2014 at the request of the Mayor and City Council, the City Attorney drafted an AFS ordinance that was adopted in January, 2015. The

ordinance covers pawnbrokers, title pledge lenders, deferred presentment services, and check cashers. The ordinance references Tennessee Code Annotated for its definition and these AFS establishments are regulated by the state. A special exception provision was developed in their ordinance where all new AFS businesses have to seek a special exception by City Council for locating in zoning districts where these uses are permitted. However, the uses have to meet the following spacing requirements: (1) no new AFS business can locate within thousand three hundred twenty (1,320) feet (1/4 mile) from any existing AFS business and (2) no new AFS business can locate within five hundred (500) feet from of any residentially zoned property. The distance of five hundred (500) feet from residential is the same provision that is the City's regulations controlling adult oriented businesses.

Memphis - In 2008, Memphis – Shelby County adopted definitions for financial services, payday loan, and title loan establishments and adopted location and distance separation requirements for these uses. These uses are listed as permitted uses within Memphis' heavy industrial and employment zones. Special use approval is needed for their general office, commercial mixed use-1, and commercial mixed use-2 zones. Their spacing requirements differ from that of Chattanooga in that they require one thousand (1,000) feet from any other establishment offering payday loans or title loans and one thousand three hundred twenty (1,320) feet from the boundary of a residential or landmark district.

Nashville – In 2014, the Metropolitan Government of Nashville and Davidson County adopted zoning regulations for AFS covering the same uses as Chattanooga (pawnbrokers, title pledge lenders, deferred presentment services, and check cashers).

Their ordinance differs from Chattanooga's AFS ordinance in that they have a separate spacing requirement for pawn brokers (1,320 feet from an existing pawn broker) and they do not have a distance from residential provision in their ordinance. AFS uses are allowed in the following zones with conditions: mixed-use neighborhood, office neighborhood, and commercial neighborhood zones, provided that the business meet the separation standards.

AFS IN KNOXVILLE

Assuming that we define AFS the same way Chattanooga and Nashville does then there are eighty-one (81) AFS establishments in Knoxville, sixteen (16) in Knox County and two (2) in the Town of Farragut (See Map 1). More specifically, there are three (3) pawnbrokers, eleven (11) title pledge lenders, nineteen (19) deferred presentment services, and three (3) check cashers that have one license. There are another forty-five (45) establishments with multiple licenses. The location of these businesses comes from their licensing information from Tennessee's Department of Financial Institutions and Knox County Clerk's Office as of March 2015.

In mapping these locations we found that there are several concentrated clusters of AFS establishments along Clinton Highway, Broadway, Chapman Highway, Magnolia Avenue, and Kingston Pike (See Map 2). The highest concentration of existing AFS establishments is at Clinton Highway and Merchants Drive. For example, the cash checking establishment at 5100 Clinton Highway has seven (7) AFS establishments within 1,000 feet of each other.

Twenty-eight percent (28%) of the existing AFS establishments are located within or border a census tract that has the median household income of less than eighty percent (80%) of that of the City of Knoxville's (See Map 3). The percentage breakdown contained in Map 3 is what is commonly used by the United States Department of Housing and Urban Development. This illustrates that these establishments are not located primarily in low income neighborhoods, but one could argue they are located more often in low rent locations that also have heavy vehicular travel volumes.

Currently, AFS establishments may locate in zoning districts which permit financial services, financial institutions, and banks. The AFS establishments are currently located in the following zoning districts: General Commercial District (C-3), Highway and Arterial Commercial District C-4), General Commercial Park District

(C-6), Neighborhood Shopping Center District (SC-1), Community Shopping Center District (SC-2), Regional Shopping Center District (SC-3), and Retail and Office Park District (PC-1).

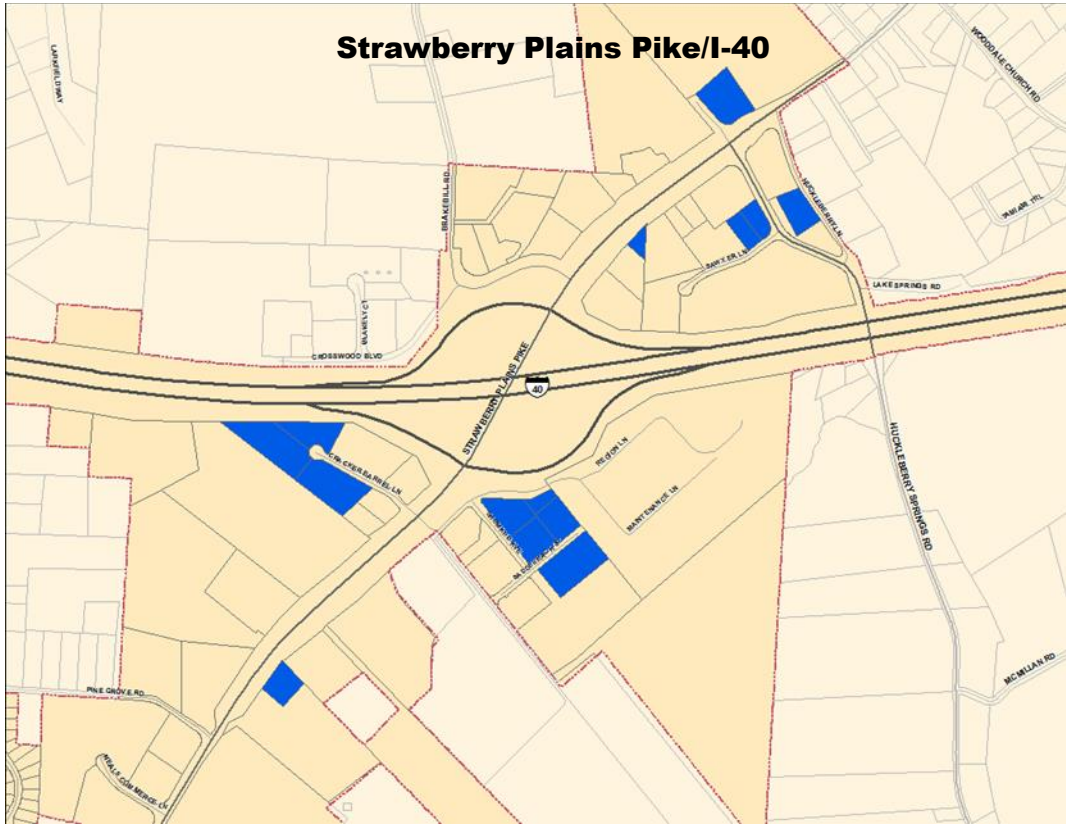
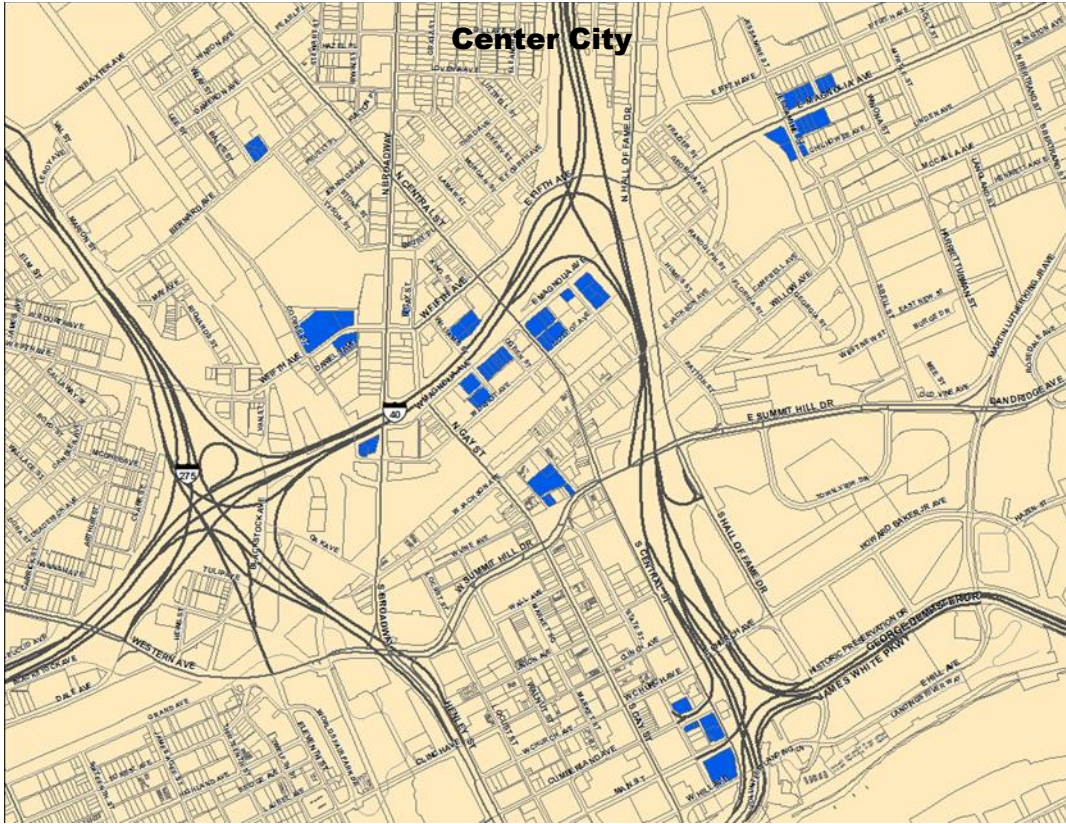
ANALYZING SPACING STANDARDS

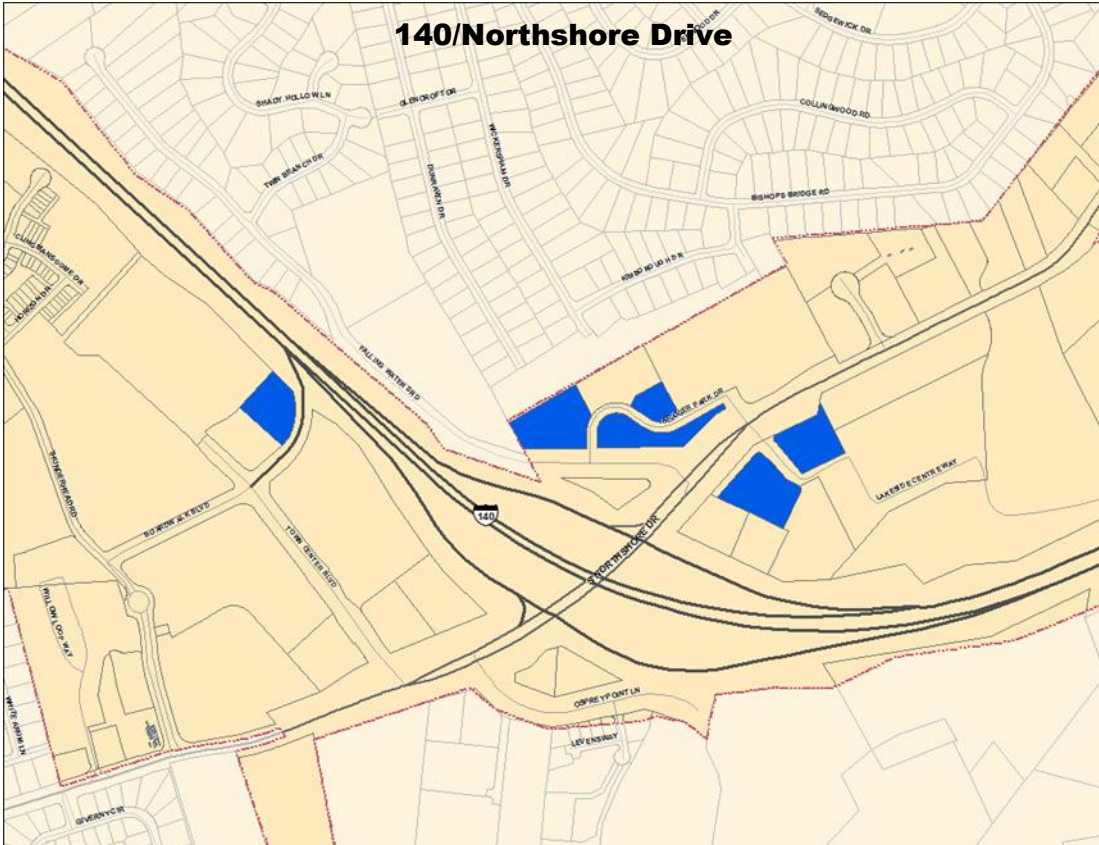
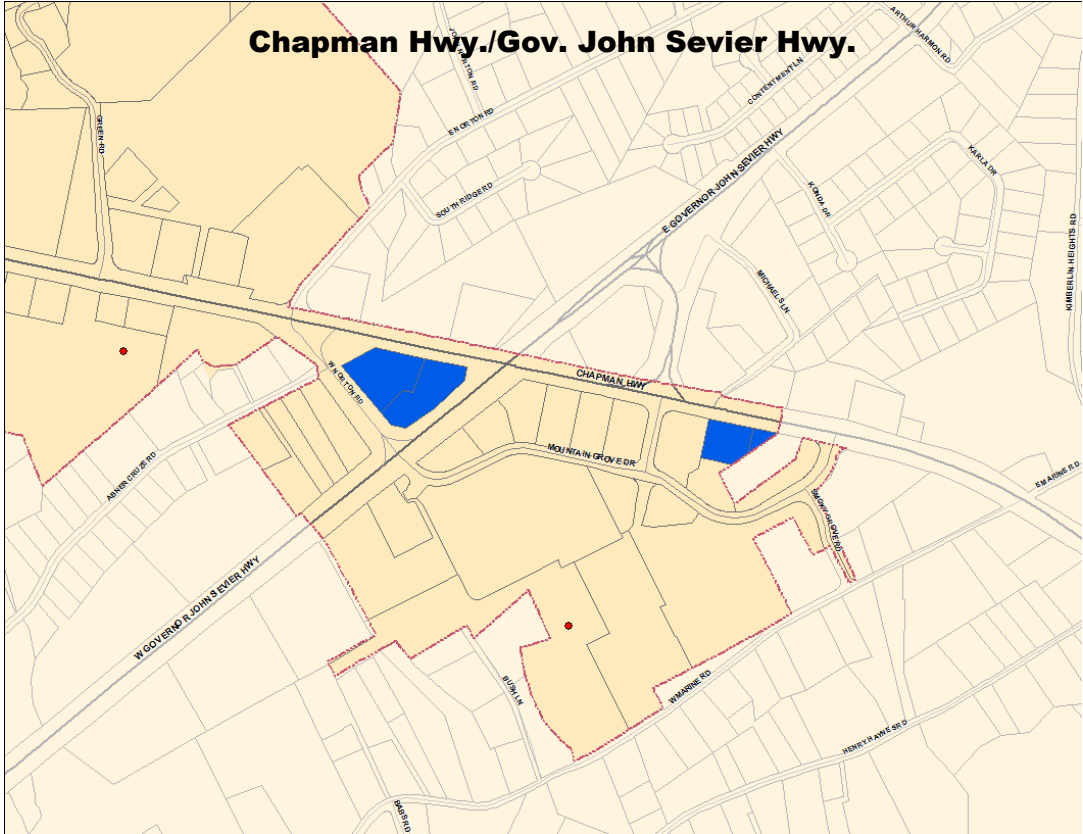
In analyzing possible spacing standards for Knoxville’s Zoning Ordinance, we analyzed the spacing standards used by other Tennessee cities. Included in this analysis was spacing standards from another AFS use which included the one thousand (1,000) foot spacing standard used by Memphis and the one thousand three hundred twenty (1,320) foot spacing standards used by Chattanooga and Nashville. Also, we looked at the spacing standards from residential where Chattanooga uses five hundred (500) foot spacing standard from AFS to residential property.

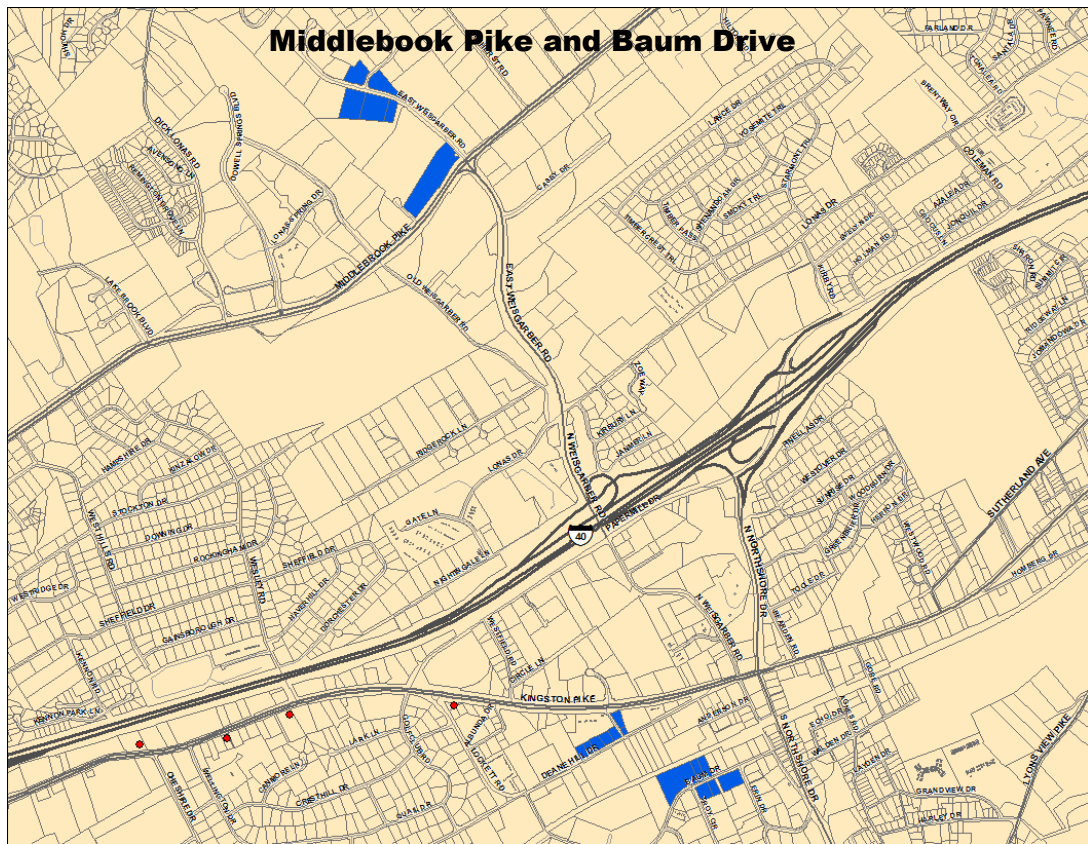
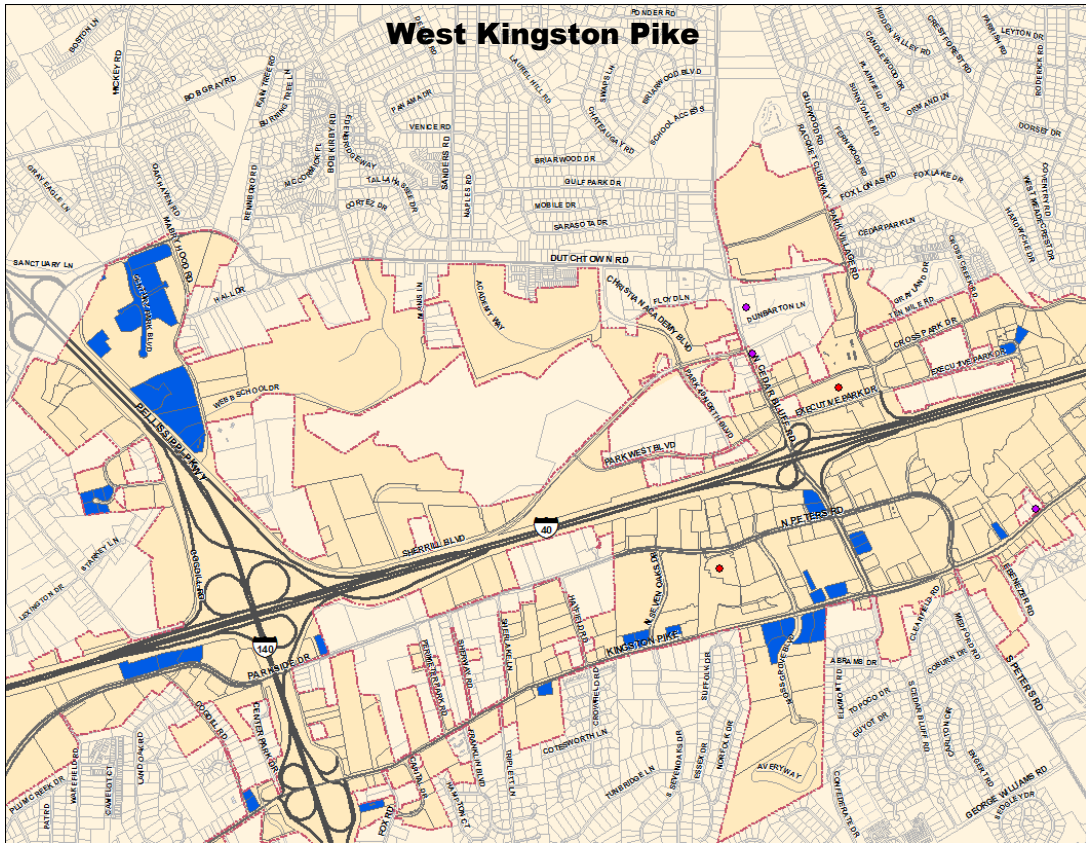
Each city has their own way of measuring and other spacing standards in their ordinance, so to make our spacing standard consistent with other City of Knoxville requirements, we recommend the utilization of the one thousand (1,000) foot spacing standard from an existing AFS and the one thousand (1,000) foot spacing standard from residentially zoned properties. This would be consistent with existing regulations Application of for sexually oriented businesses (ARTICLE XII, Sec. 16-468). Maps 4 and 5 show how each separate standard would be applied to Knoxville, if only one standard were to be adopted.

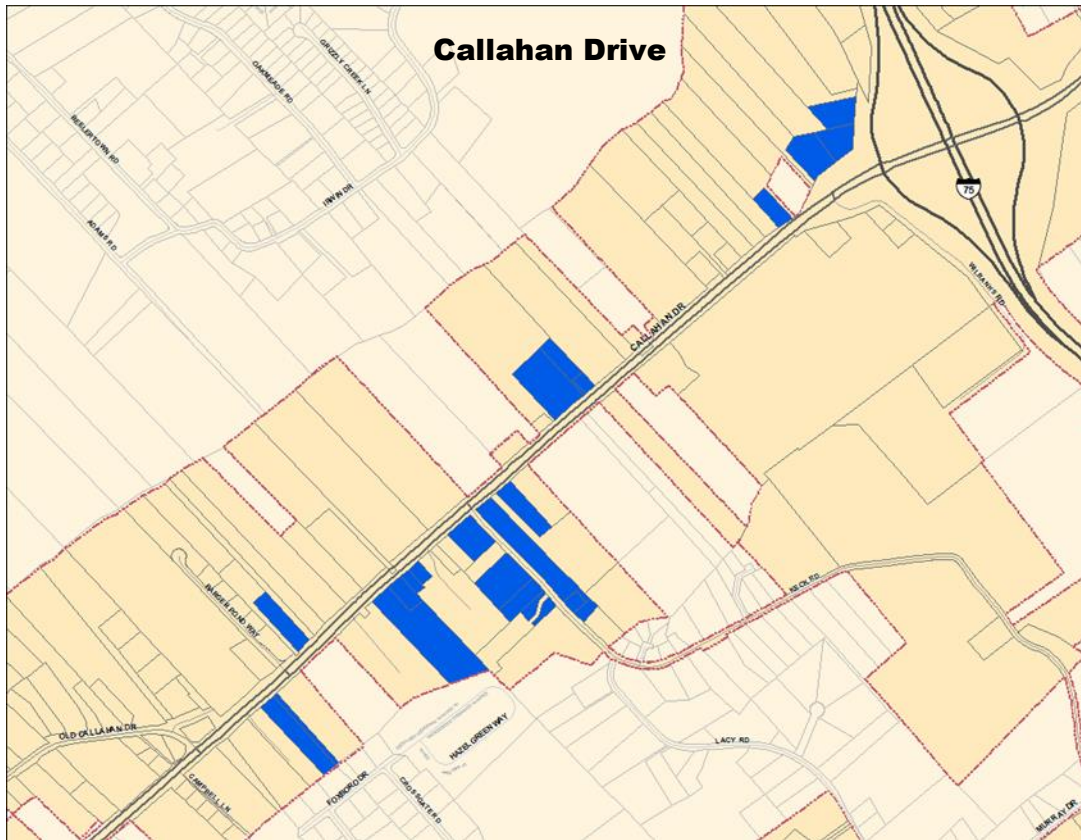
Adopting the two standards would result in seventy four (74) of the eighty one (81) AFS establishments being legal non-conforming. This would leave two hundred seven (207) eligible parcels or two hundred twenty six (226) eligible acres where a new AFS establishment could locate. The majority of these parcels are located in seven areas, which are shown on the following pages and the number of parcels and acreage for these areas are found below on Table 1. These same areas are shown on Map 6.

TABLE 1: AREAS WITH ELIGIBLE PARCELS		
Areas Shown on Map 6	Number of Parcels	Number of Acres
Center City	65	18
Strawberry Plains Pike/I-40	14	19
Chapman Hwy./Gov. John Sevier Hwy.	4	5
140/Northshore Drive	6	9
West Kingston Pike	41	86
Middlebook Pike and Baum Drive	19	24
Callahan Drive	23	25
<i>Other</i>	35	39
TOTAL	207	225









RECOMMENDATIONS

There is no clear cut research that regulating or not regulating these businesses locally, benefits the community. However, in the absence of stronger federal or state rules for AFS many communities like Knoxville are facing the issue of whether to adopt local regulations. There appear to be two options, either to adopt spacing requirements or to take no action; these options are further detailed below.

Option 1: Develop a Spacing Standard

It is important to note, any new regulations would not apply to existing businesses. Develop one thousand (1,000) foot spacing requirement from another AFS and one thousand (1,000) foot requirement from the nearest residentially zoned parcel would require adding new sections to the City of Knoxville's Zoning Regulations (Appendix B) for new AFS establishments. This could include adding the following sections:

1. Definition for AFS (borrowed from Chattanooga), as follows:

“Alternative Financial Service” means establishments that are:

- (a) not licensed by an appropriate state or federal agency as a bank, savings and loan association, or credit union, industrial loan and thrift offices, insurance premium finance companies, or mortgage companies;
- (b) regulated by the Tennessee Department of Financial Institutions; and
- (c) categorized for purposes of this Ordinance as:

1. "Pawnbrokers" as defined at T.C.A. § 45-6-203; or
 2. "Title Pledge Lenders" as defined at T.C.A. § 45-15-103; or
 3. "Deferred Presentment Services" as defined at T.C.A. § 45-17-102; or
 4. "Check Cashers" as defined at T.C.A. § 45-18-102 except that Check Cashers do not include Check Cashers exempt from state regulation pursuant to T.C.A. § 45-18-103, or
- (d) any combination of Alternative Financial Services which include, but are not limited to, "Pawnbrokers", "Title Pledge Lenders", "Deferred Presentment Services" and/or "Check Cashers" as defined herein.
2. Add a new section to the Supplementary Regulations (Article V) for AFS (Section 25) which would include the following spacing provisions:
 - (a) No facilities within one thousand (1,000) feet of an existing Alternative Financial Service.
 - (b) No facilities within one thousand (1,000) feet of a residential use or zone district primarily for residential uses.
 3. Add AFS to "Uses permitted on review" to the C-3, C-4, and C-6 zoning districts. These uses would also be allowed in all the zoning districts where these establishments are currently located, including the following planned districts: SC-1, SC-2, SC-3, and PC-1. AFS establishments would not be permitted as a use by right or a use on review in any other zoning districts.

Option 2: Take No Action

Take no action. One may believe that any new regulation should be controlled through the state or federal government. As noted earlier, the Consumer Financial Protection Bureau is proposing new rules for these lending establishments. Some people may believe controlling the spacing may result in harming consumer choice and competition for services. If spacing requirement is not pursued, we may want to watch for new federal and state controls for this industry and monitor the impacts on Knoxville.

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Map 1: Location & Type of AFS Establishments

Legend

Licensed AFS Establishments

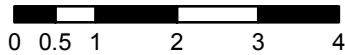
- Deferred Presentment
- Title Pledge Lender
- Check Cashing
- Pawnbroker
- Multiple Services

Incorporated Areas in Knox County

- ▭ Knoxville
- ▭ Farragut

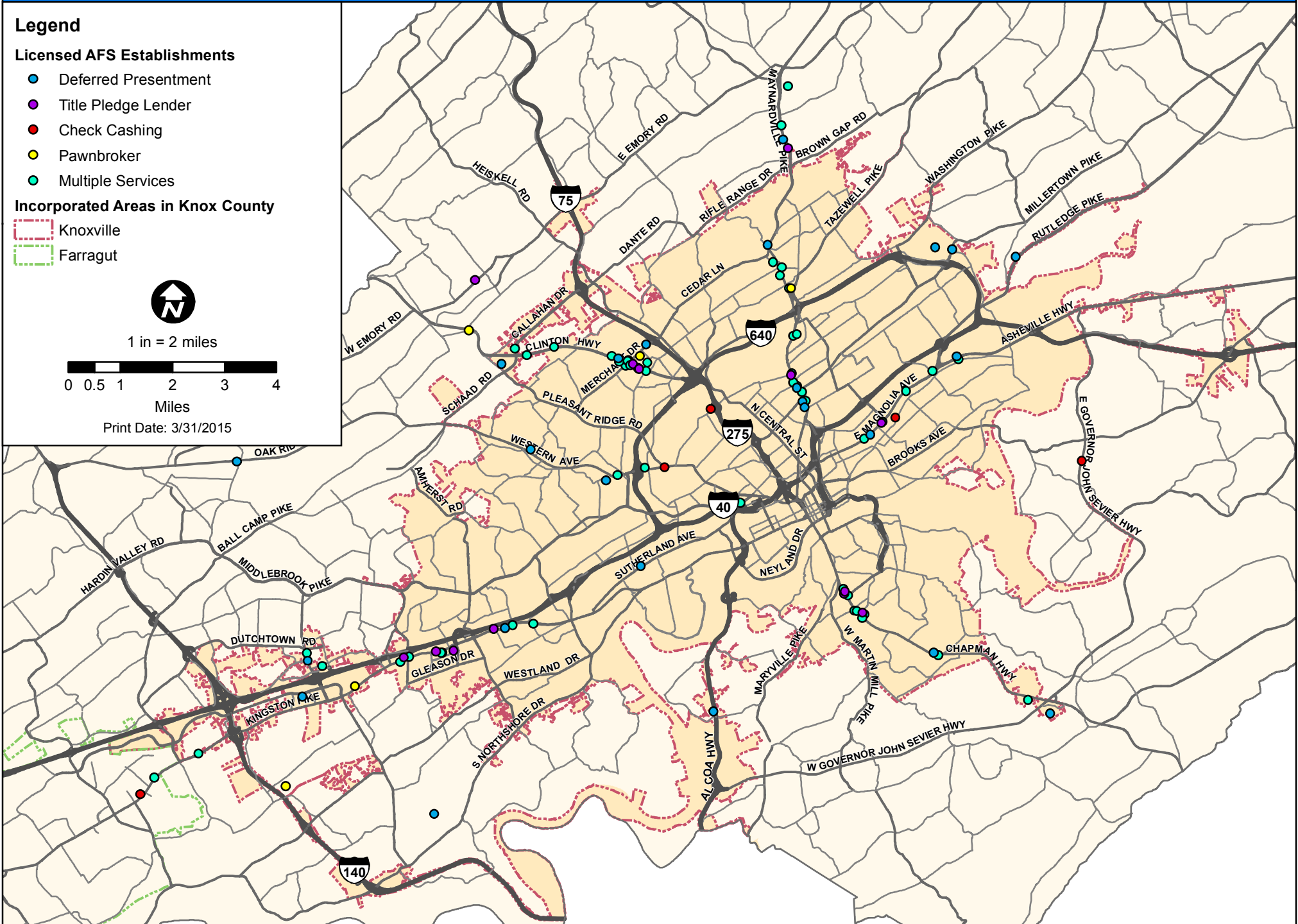


1 in = 2 miles



Miles

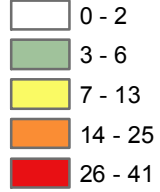
Print Date: 3/31/2015



Map 2: Density of AFS Establishments

Legend

AFS Density (per sq mi)

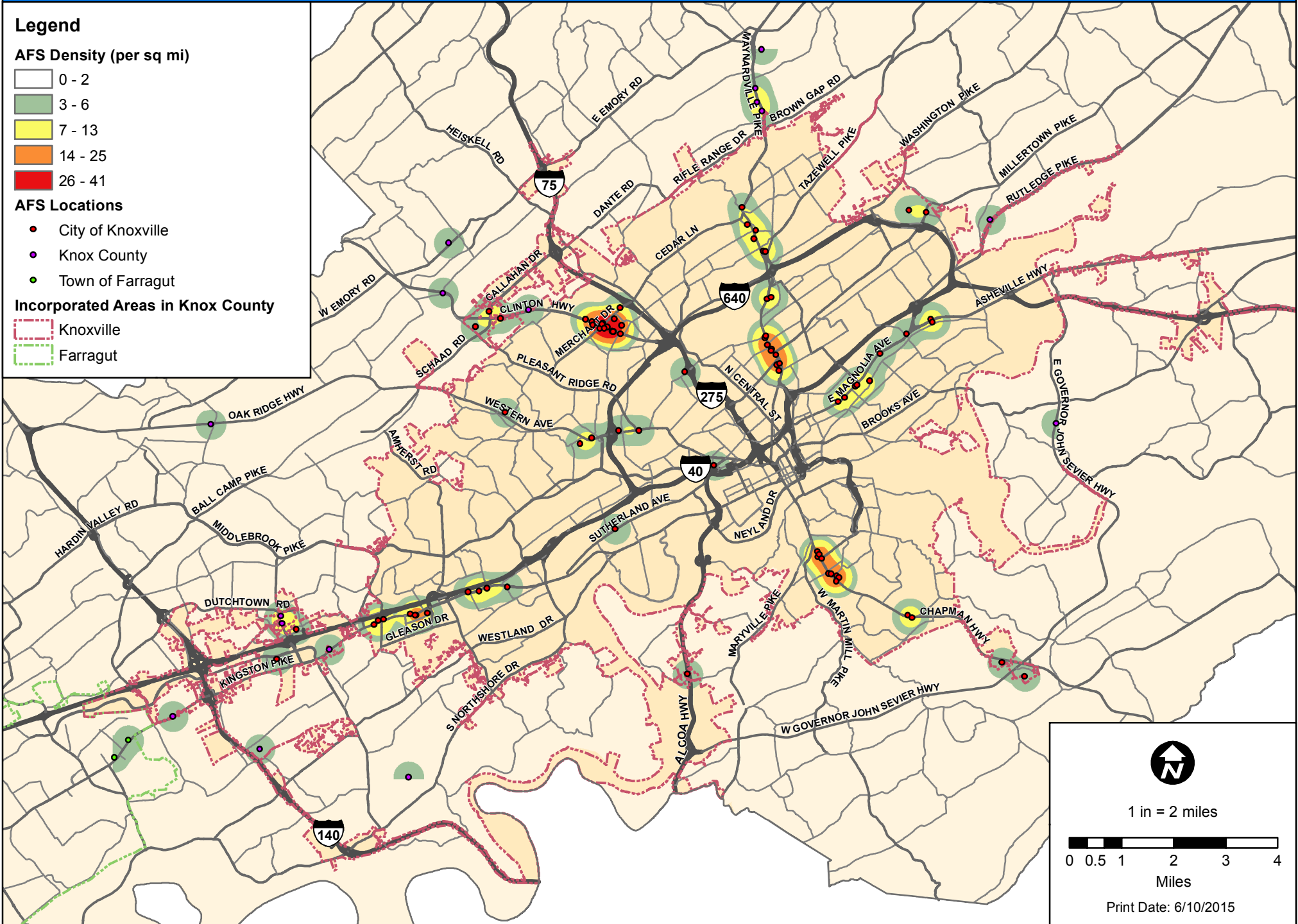


AFS Locations

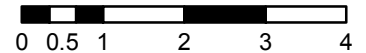
- City of Knoxville
- Knox County
- Town of Farragut

Incorporated Areas in Knox County

- ▭ Knoxville
- ▭ Farragut



1 in = 2 miles



Miles

Print Date: 6/10/2015

Map 3: AFS Locations and Median Household Income

Legend

Median Household Income*

\$33,118 in 2008-2012

- Less than 80%
- 80 - 100%
- 100 - 120%
- More than 120%

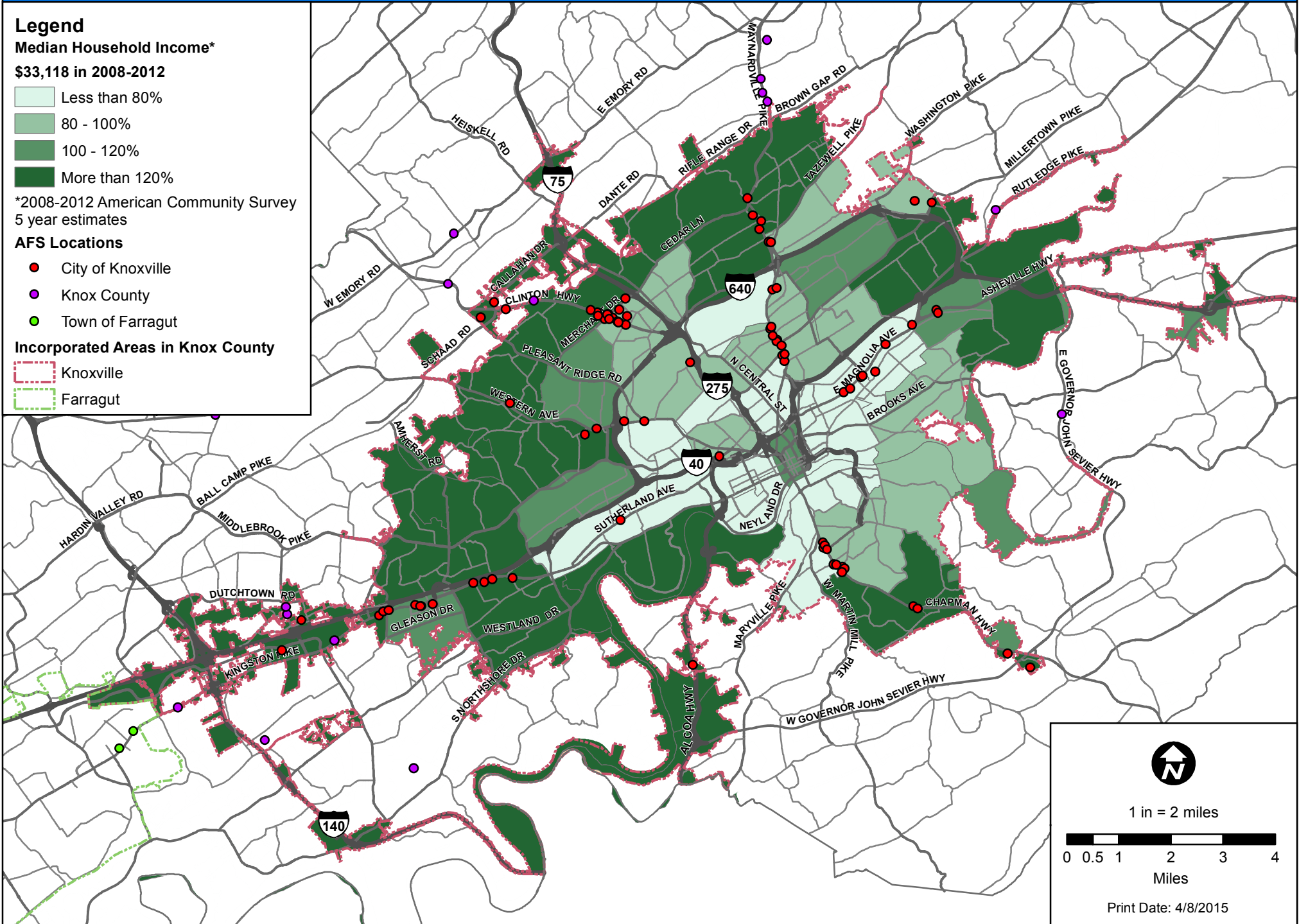
*2008-2012 American Community Survey
5 year estimates

AFS Locations

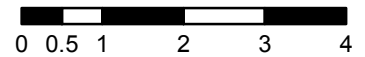
- City of Knoxville
- Knox County
- Town of Farragut

Incorporated Areas in Knox County

- Knoxville
- Farragut



1 in = 2 miles



Miles

Print Date: 4/8/2015

Map 4: Application of 1,000 Foot AFS Separation Standard

Legend

AFS Locations

- City of Knoxville
- Knox County
- Town of Farragut

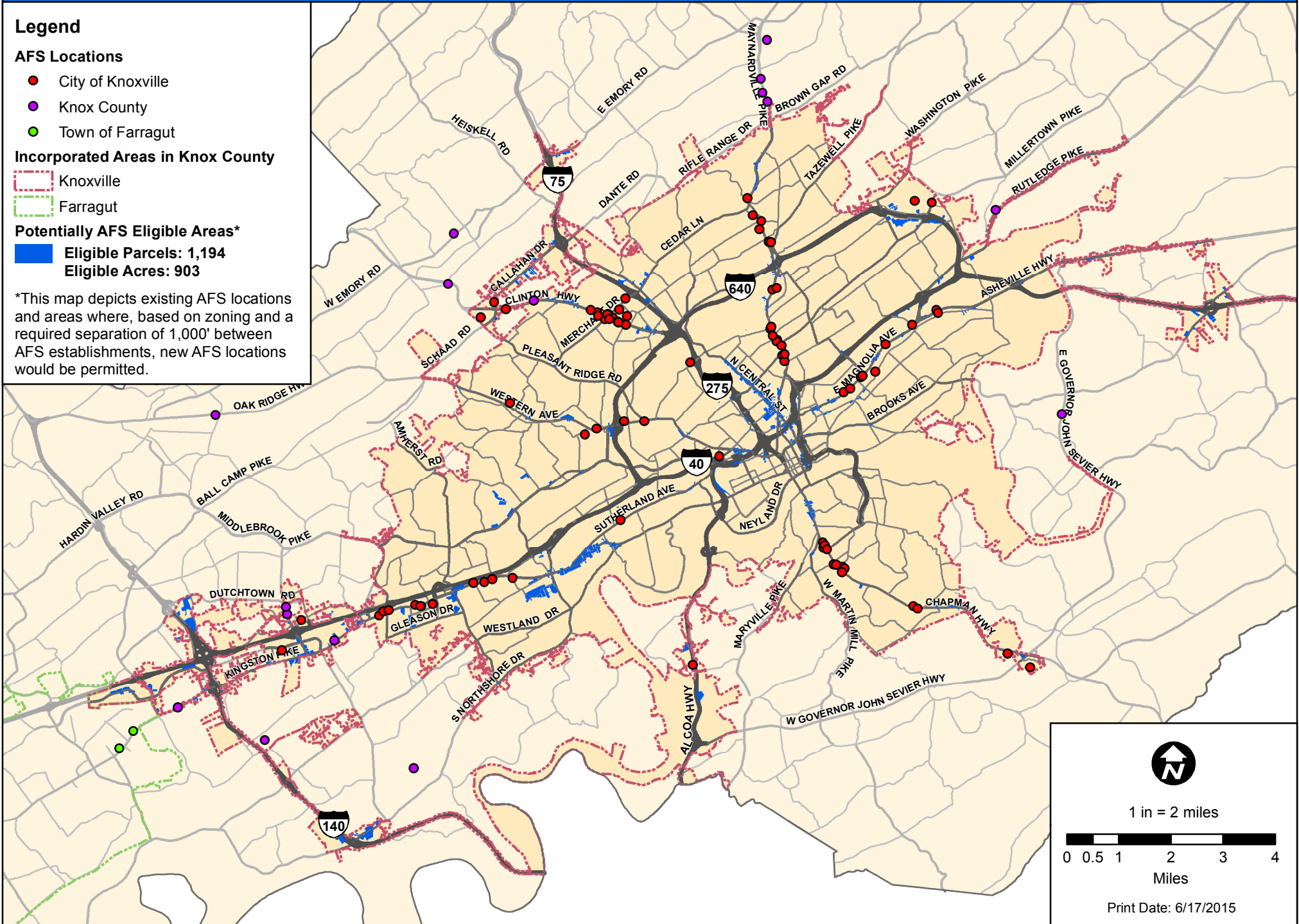
Incorporated Areas in Knox County

- ▭ Knoxville
- ▭ Farragut

Potentially AFS Eligible Areas*

- ▭ Eligible Parcels: 1,194
- ▭ Eligible Acres: 903

*This map depicts existing AFS locations and areas where, based on zoning and a required separation of 1,000' between AFS establishments, new AFS locations would be permitted.



Map 5: Application of 1,000 Foot Residential Zoning Separation Standard

Legend

AFS Locations

- City of Knoxville
- Knox County
- Town of Farragut

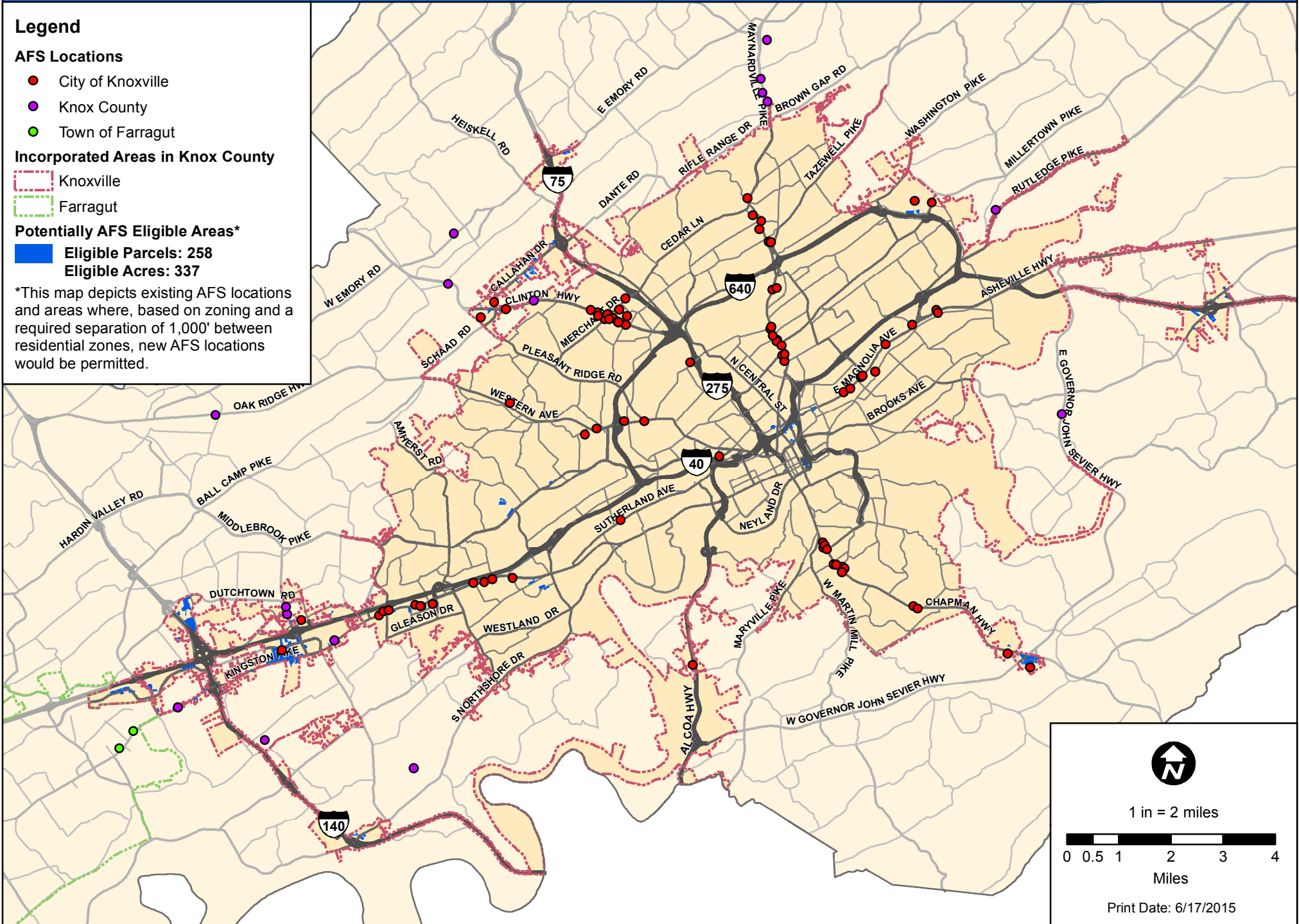
Incorporated Areas in Knox County

- Knoxville
- Farragut

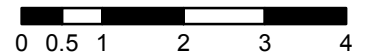
Potentially AFS Eligible Areas*

- Eligible Parcels: 258
- Eligible Acres: 337

*This map depicts existing AFS locations and areas where, based on zoning and a required separation of 1,000' between residential zones, new AFS locations would be permitted.



1 in = 2 miles



Miles

Print Date: 6/17/2015

Map 6: Application of 1,000' AFS and 1,000' Residential Zoning Separation Standards

Legend

AFS Locations

- City of Knoxville
- Knox County
- Town of Farragut

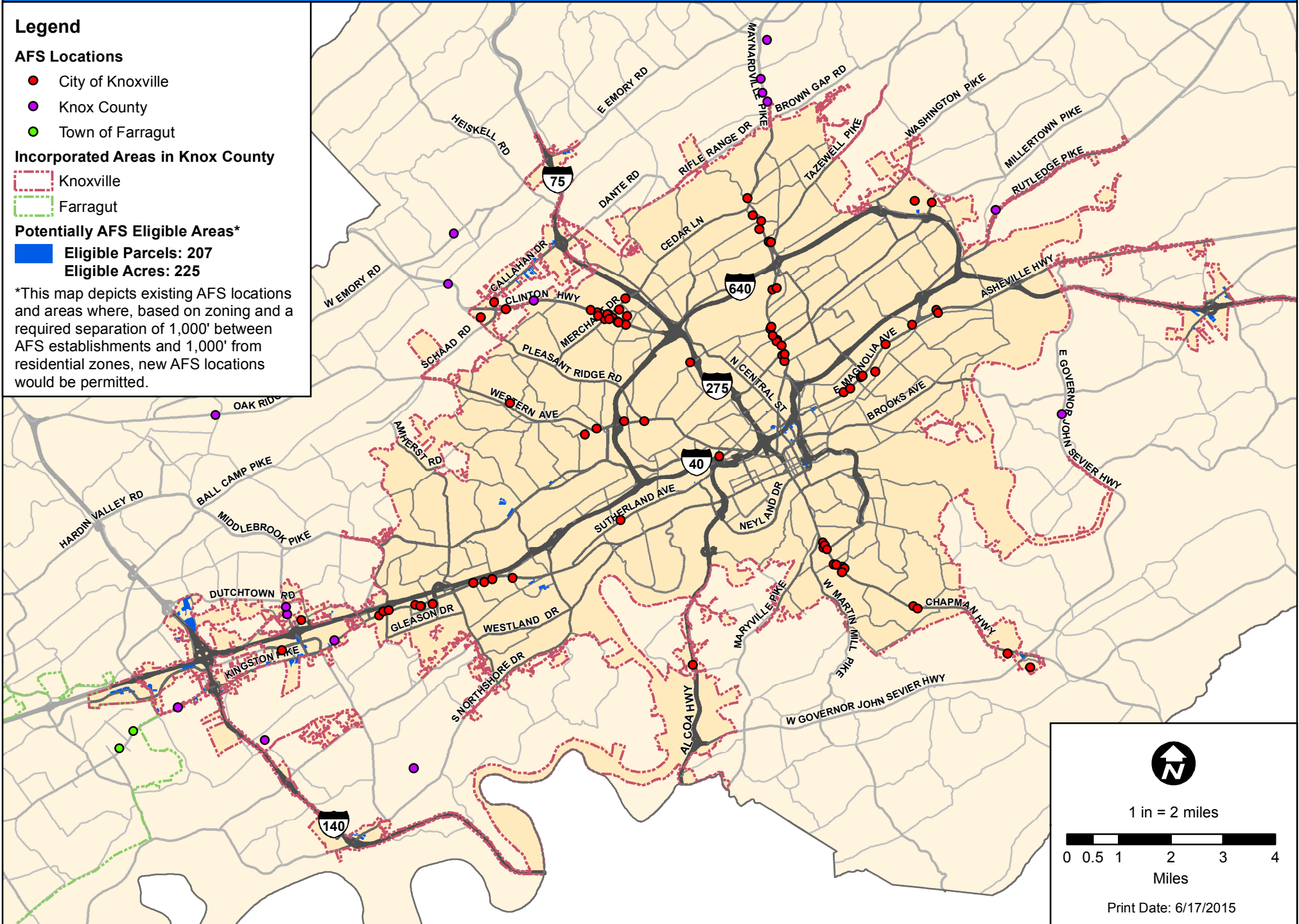
Incorporated Areas in Knox County

- Knoxville
- Farragut

Potentially AFS Eligible Areas*

- Eligible Parcels: 207
- Eligible Acres: 225

*This map depicts existing AFS locations and areas where, based on zoning and a required separation of 1,000' between AFS establishments and 1,000' from residential zones, new AFS locations would be permitted.



1 in = 2 miles



Print Date: 6/17/2015