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# ZONING PRACTICE

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## In Defense of Local Zoning

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# In Defense of Local Zoning

by Harvey M. Jacobs

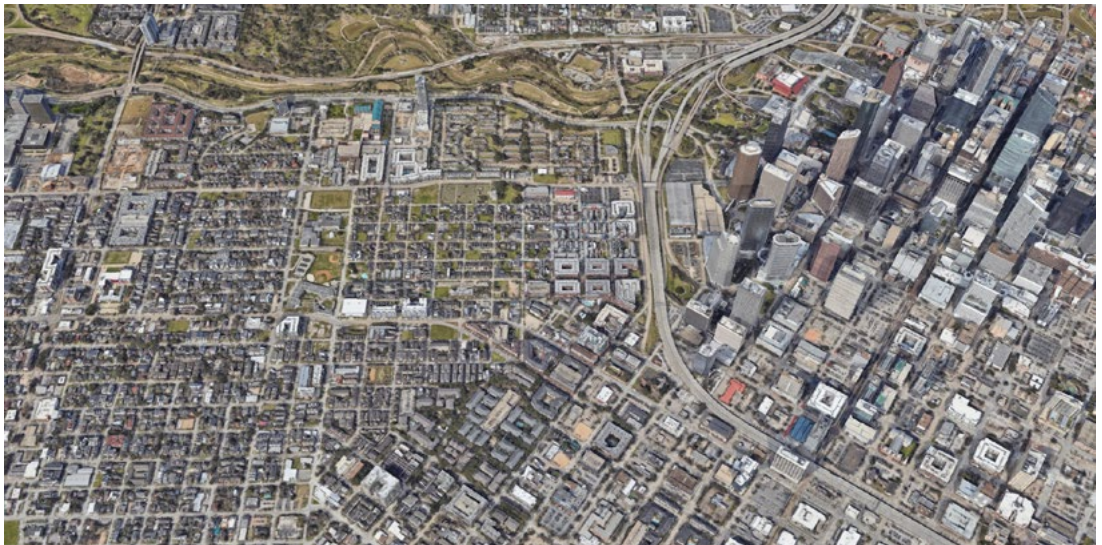
Zoning is under very active attack. Multiple states have already made substantial changes to state enabling acts, and other states are considering major revisions. Almost all of these changes are prompted by concerns about low- and middle-income housing availability and cost and, thus, are intended to facilitate more affordable housing alternatives. In the most radical of situations, the very existence of exclusive single-family zoning districts is being targeted, as are densities adjacent to public transit. The states getting the most attention in the reform efforts include the western states of California, Montana, Oregon, Utah and Washington, and the eastern states of Connecticut and Maine, though there are others (see Flint 2023).

In October 2022 the president of the Lincoln Institute of Land Policy said that it was zoning's asteroid moment—akin to when an asteroid allegedly caused dinosaurs to go extinct (McCarthy 2022). [M. Nolan Gray's](#) 2022 book *Arbitrary Lines* points out some of zoning's weaknesses and argues for substantial reform, including its total elimination. Gray suggests that

zoning limits housing choice and increases cost, restricts economic growth, contributes to racial and income segregation, and facilitates urban sprawl. Gray expresses strong skepticism as to whether zoning even does what it says it is supposed to do. He ends up calling for a movement away from zoning towards something else.

This issue of *Zoning Practice* joins the current debate about zoning's future by arguing in defense of local zoning. This essay puts the current proposals into a broader historical context of proposed zoning reform over the decades, wondering whether current reformers (like past ones) may be expecting too much from proposed changes. It also raises the issue of whether the debate is really about zoning per se or is, instead, a thinly veiled critique of local control. Zoning's critics raise important issues, and there has to be a way to talk about them. Planners can contribute to this debate through local education and recognizing the inherently strong position of local governments. Zoning's future lies in a negotiated rearrangement between reformers' and locals' interests.

A portion of downtown Houston and its unzoned environs (Credit: Google Earth)





## Historical Context

As planners and others know, zoning has long been subject to criticisms. In 1970 Bernard Siegan touted non-zoning in Houston, arguing that zoning followed markets, but did not shape them, and that there was no discernable difference between zoned and unzoned cities (his “you can’t tell the difference from the air” test). And in fact, Gray uses Houston as one of his non-zoning examples. Critics on the right have continued with this line of attack for decades, as land policy evolved into growth management, growth control, environmental policy, etc.—each time arguing, at a minimum, zoning’s negative effects on housing availability and cost. Added to this critique is a speculation that zoning stifles efforts at land-use innovation by lagging market demands and opportunities.

With ever increasing fervor, those on the left got into this discussion, noting zoning’s negative exclusionary effects. In 1975 the New Jersey Supreme Court issued what has become known as its so-called Mt. Laurel I decision (*So. Burlington Cty. NAACP v. Mount Laurel Tp.*, 456 A.2d 390, 92 N.J. 158 (1983)). The court required that local governments act affirmatively, via zoning, to allow for more affordable housing (Williams 1975). The Mt. Laurel decision further incentivized efforts to foster exclusionary zoning’s opposite—inclusionary zoning. Unfortunately, success has been mixed (Holmes 2013; Mukhija et al. 2015).

As far back as 1964, John Reps, an honored centrist figure within the field, called for a “requiem for zoning,” a decided heresy at the time (Reps 1964). And a few years later Richard Babcock published his modern classic in the land-use regulation field, *The Zoning Game* (Babcock 1966). In this witty, cutting, and incisive observation and critique, Babcock gave voice to the experience of many planners, land-use lawyers, and zoning administrators. Zoning was not an exact science; zoning had within it a great deal of discretion for interpretation (and misuse). (In the current mode of full disclosure, let me note that John Reps was my Ph.D. supervisor at Cornell University, and I own his copy of Babcock’s book, which carries the inscribed dedication from Babcock:

“To John Reps, One academician who probably can put up with an unacademic commentary.”)

Within a decade, 60 years after zoning’s invention in New York City and 50 years after its validation by the U.S. Supreme Court, Reps’ and Babcock’s critiques seemed prescient. This was the heady time of the so-called quiet revolution in land-use control (Bosselman and Callies 1971; Popper 1981) and the promulgation of the American Law Institute’s (ALI) *Model Land Development Code*, a proposed revision for the 1929 Standard Zoning Enabling Act (Kaiser and Godschalk 1995). Both acknowledged critiques of zoning and touted efforts by state legislatures to revise state enabling laws, especially for what the ALI code denoted as “developments of regional impact” (Mandelker 2001). Planners and others looked to Vermont’s Act 250, New York’s Adirondack Park Agency, Wisconsin’s Shoreland Protection Program, California’s Coastal Zone Management Program, and Oregon’s statewide program, among others, as examples of new institutional relationships, and even perhaps a new ethical framework, for land-use management. What these approaches all did was respond to the critiques of zoning by removing land-use-management authority from local units and transferring it to a level above the local (county, region, or state).

**While significant, the quiet revolution did not yield the grander end result some had hoped for.**

These efforts were not without criticism. Those on the right bemoaned the loss of local control and, in anticipation of the forthcoming property-rights movement in the 1990s, centered their arguments in America’s founding period and the arguments of selected key founders (e.g., McClaughry 1975). Those on the left expressed skepticism about whose interests were actually being served by these institutional rearrangements and, à la Jane Jacobs, specifically wondered whether the real estate sector would actually gain

more power over local citizens as a result of these changes (e.g., Walker and Heiman 1981). Yet others on the left began to pay attention to who controlled local land-use planning procedures and noted that it was land politics that dominated local politics. Because locals controlled the rules for land, those who stood to benefit were the primary participants in rule making and rule administration (Molotch 1976).

While significant, the quiet revolution did not yield the grander end result some had hoped for; it largely petered out by the mid-1970s (but it is important to note that Popper 1988 argues that many of the movement's objectives were realized, though in forms different than originally expected). But criticisms of zoning continued.

In his 1964 “requiem” essay, Reps bemoaned many aspects of then-contemporary zoning, some of which have changed but some of which haven't. Reps wanted a more regional approach to land-use management, a more flexible (rather than rigid) tool, an approach that linked zoning to a comprehensive plan, a more “English” approach, where greater discretion was vested in planners to negotiate with applicants for an outcome that served both the plan and the greater public interest (among other recommendations). Some of these changes are not feasible in today's political climate. But others reflect still-contemporary criticisms.

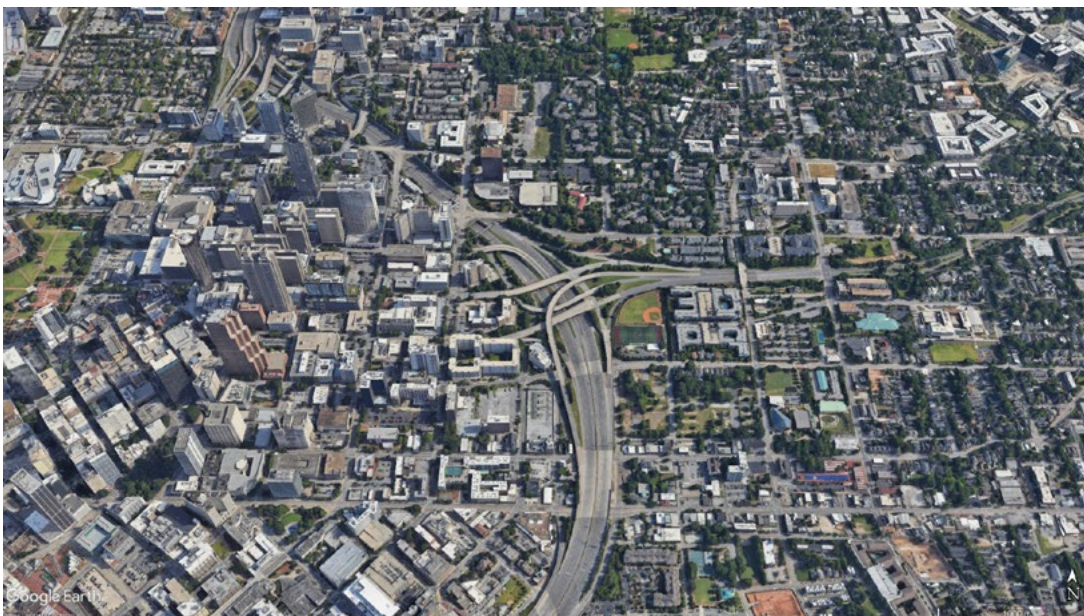
So, proposals for alternatives within or to zoning continued. Over the decades these have included performance zoning, floating zones, incentive zoning, form-based zoning, new urbanist zoning, and others, such as transfer of development rights. Some of these proposals have resulted in substantial implementation.

But none of these alternatives replaced the widespread use of Euclidean zoning; Euclidean zoning has endured, even thrived (Haar and Wolf 2002). Yet it has also continually adapted and reshaped itself. And as the current debates demonstrate, what Haar and Kayden noted in 1989 is still true—it has “promises still to keep” (Haar and Kayden 1989).

### **Zoning's Asteroid Moment?**

Is this zoning's asteroid moment; will it die; should it die? No, I don't think so.

But is zoning problematic in practice? Yes. Do most zoning ordinances unduly restrict accessory dwelling units (ADUs) and other forms of “missing-middle” housing options? Yes. (Remember that what was substantively at issue in the Euclid case was the right of the municipality to exclude apartments (Wolf 2008)). Has zoning been used to facilitate exclusion by race, class, and income (and other categories)? Yes; see as examples Silver (1991) and Pendall (2000). Are these problems



*A portion of downtown Atlanta and its zoned environs (Credit: Google Earth)*

solely the fault of zoning per se? Not in my opinion. In fact, in my opinion the current piling on of criticisms of zoning leading some to call for zoning's wholesale elimination as a local land-use management tool is leading to a "throw the baby out with the bathwater" situation.

Zoning is a police power action rooted in efforts to promote health, safety, welfare, and, yes, morals. Again, the argument in Euclid and into the decades forward is that renters are different types of land users. They don't care for property in the same way owners do. Thus rental units—especially multi-family rental units, but really all rental units— have an impact on overall property values. In this instance, a land economic argument is blended into a moral argument.

Yet zoning's rules provide for a degree of predictability and certainty to individuals (they know what is likely to occur next to and around them), and as such, it provides guidance and stability to real estate markets (investors, lenders, insurers, and related actors). For instance, it provides some assurance that incompatibility in land uses will not occur, or will be kept to a minimum.

Recall that, in the era before zoning, urban land was a jumble of unsanitary and unsafe land uses, as each individual land owner and user sought to maximize their own self-interest (as market rules told

them they should) (Riis 1890). Some of this jumble may have gotten too tidy as a result of zoning, but some dangerous and unhealthy situations were repaired or, in the case of new development, avoided.

### **What Is the Argument Really About?**

I want to argue that critiques of zoning are actually not about zoning per se. Rather they are about two other components (that are intertwined) of how zoning is applied. One critique is about the fact that zoning is a *local* government function. A second related critique is about the *politics* of zoning—how local zoning is captured and used by a local elite.

When zoning was invented and state enabling acts were first passed, zoning authority was devolved to urban local governments. This did not have to be. It is states that have residual authority for any powers not specifically yielded to the federal government under Article X of the U.S. Constitution ("The powers not delegated to the United States by the Constitution, nor prohibited by it to the States, are reserved to the States . . ."). So why urban local governments? Because in the early 20<sup>th</sup> century, it was cities that were experiencing land-use problems that required some response (often as a result of both rural-to-urban population migration and international immigration). So zoning became local through, if you will, an accident of history.

This local control proved to be both functional and dysfunctional. Its advocates argue that land and land use are strongly place based. Land can vary in character over very short distances. Thus, it and its management are best understood by those closest to it. And those closest to it have strong incentives to treat land sustainably and responsibly because owners directly benefit from good management. And besides, local control is deeply and fundamentally American—think the New England town meeting (see Jacobs 1989 for an extended discussion of this argument).

Critics of local control agree that the arguments for local control can be true in theory. But they argue that these arguments are often violated in practice. In fact, the history of local control

Tenement housing  
in New York's  
Lower East Side  
in the late 19<sup>th</sup>  
century (Credit:  
Jacob Riis, from  
How the Other  
Half Lives)





evidences a practice that is often parochial, elitist, discriminatory, unsustainable, often seeks to maximize the self-interest of the local owner and community against other owners and local communities. From this perspective, local control is socially and ecologically irresponsible. And in an increasingly complex world, locals rarely have the expertise they need to make well-informed management decisions.

During the period of the quiet revolution, in all the excitement about regionalism, Popper (1974) offered a caution. In other areas of public policy reform, the expected benefits of regional authority were not realized. Why? The new agency was often underfunded and short staffed. Thus, it fell prone to agency capture, where those it was intended to regulate became the source of data and expertise about the regulatory process. And because it was more centralized, access to the rule-making and decision-making processes became harder for those without substantial resources. So administrative processes were more opaque. What emerged was a version of local control—policy administration that was socially and environmentally irresponsible (though in different ways).

Will the same thing occur as a result of the current zoning reform proposals? Will there be (substantial) unintended consequences. Probably. Why?

Because of the politics of zoning. Critics of local zoning do not like how the process is captured by participants, so that the substantive outcomes result in things like the restriction of ADUs and the systematic exclusion of “others.” Defenders of the politics of local zoning argue that those who are participating understand the significance of rules and are acting in the general welfare by securing high value, functional neighborhoods in cities. Reformers want to mute the impact of local participants by changing the rules within which they operate (e.g., eliminate through state legislation the possibility of exclusive single-family zoning, and more missing-middle housing will result).

So who is correct in this argument? They both are! Both sides to this issue have elements of truth in their presentations. Neighborhoods are micro places where locals often understand local resources better than non-locals. But critics are correct that locals’ definition of the greater public interest often does not meet a broader (often regional) definition.



*The edge of Donald, Oregon's state-mandated urban growth boundary (Credit: [Ian Sane, Flickr](#))*

### **A Path Forward?**

Zoning's problems, the bases of criticisms through the decades, was born into zoning. They have always been there and have long been recognized.

But not all the problems attributed to zoning can or should be put at its feet. Lenders and their historic practice of redlining have had a great deal to do with an inability of individuals in certain groups to access housing. This is now widely recognized and documented (e.g., Woods 2012). And zoning is not, by itself, responsible for high housing prices. Developers make decisions about what to build (albeit within the outlines of local regulation) and there is more profit from higher-end housing than there is from lower-end housing. Also there is the much larger role of ingrained prejudice—by race, income, ethnicity, sexual orientation, etc. In-groups band together to exclude others using whatever tools are at their disposal. These have included social networks (who finds out about housing that is for sale), racial and religious covenants, appraisal practices that value property owned by “the other” as less than that owned by the majority, banking practices, *and* local land-use regulation. So, yes, zoning has been one of these tools.

**There is no reason that zoning cannot become more socially responsible, while we engage in a heated debate about exactly what that should mean.**

For decades, we have been searching for a way to have a socially responsible local system of land-use management. Zoning has endured because it is embraced by local communities and local people (perhaps for the wrong reasons, from the perspective of some). Rarely is there enthusiasm for local policy, but there often is for zoning. Zoning's supporters—planners, land-use lawyers, zoning administrators, citizen activists, real estate professionals—need to find a way to maintain that enthusiasm, to give citizens in local communities substantive local control,

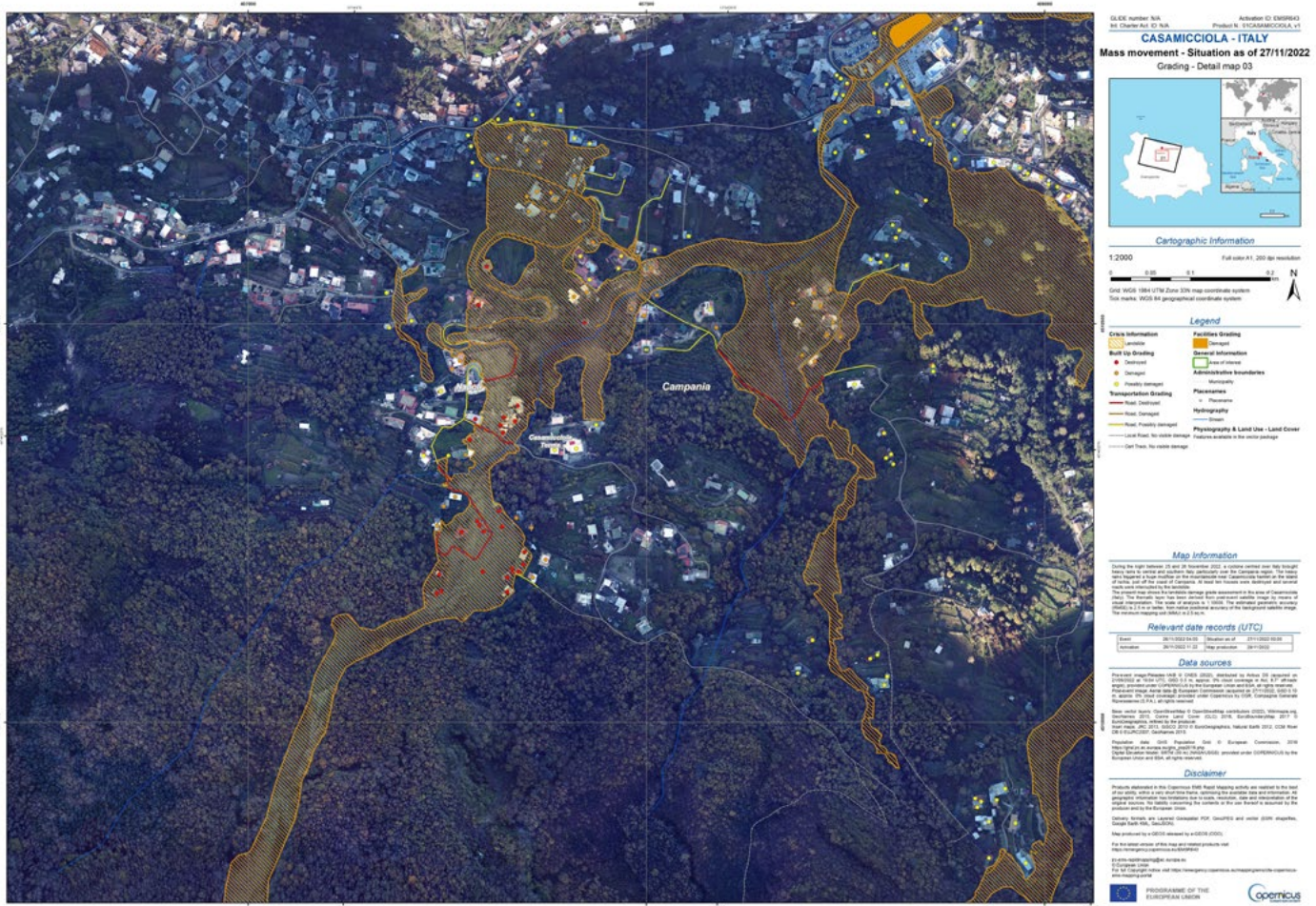
while also supporting the myriad of efforts to address the shortcomings of zoning in its current form. There is no reason that zoning cannot become more socially responsible, while we engage in a heated debate about exactly what that should mean.

Zoning has many strengths. Among them is that it is long established with a rich institutional and legal history: It was invented over a century ago and validated by the U.S. Supreme Court nearly a century ago. Local zoning is relatively easy to formulate as there are many models for communities of all sizes. It is also relatively easy to explain; a lot of people know about it and what it is supposed to do. Generally, zoning is relatively simple to administer and tends to high levels of compliance. And it allows for rapid coverage of large geographic areas relatively inexpensively. These are not strengths that should be easily shunted aside.

Zoning reform draws together a mixed set of actors, though this need not be an impediment to coalition building. For example, in July 2022, the Mercatus Center (a market-oriented think tank) at George Mason University released a “wish list” for housing reform in 2023 (Furth and Hamilton, 2022). There were 16 possible actions they identified and grouped into five headings, several of which were directed at zoning reform. Among their recommendations were many familiar to those who pursue zoning reform, and for which there is likely broad agreement: permitting ADUs, reducing mandatory parking requirements, and reducing minimum lot size requirements. But others reflect the ideological orientation of the center, and are likely to be much more controversial, such as advocating for compensation when regulations reduce property values, a long-standing position of the so-called property rights movement (see Jacobs 2010 on the property rights movement).

Informed actors of all stripes have long known what is wrong with zoning, and there are good ideas for how it could be reformed. The difficulty now is what it has always been—constructing a sustainable and durable path towards solutions, a path that balances local and greater-than-local concerns, a path that acknowledges the strengths and the weaknesses of local control.





The extent of landslide damage on Italian island of Ischia in November 2022  
 (Credit: [Copernicus Emergency Management Service](#), [Wikimedia](#))

In many instances, the state, from which the authority for local zoning emanates, needs to draw upon its inherent authority to specify substantive as well as procedural standards for local zoning. Clear standards need to be set to guide local drafting and administration. These need to address matters such as ADUs and related housing choice options, as well as the management of regionally significant environmental resources.

But there is an important role for the zoning professional—whether it be an employee or consultant—vis-à-vis the local community. The zoning professional is in a position to both educate locals (citizens and policy makers) and to advocate on their behalf.

In terms of education, locals need to be reminded that zoning authority derives from the state (many either don't know this or conveniently forget it). To the extent

locals are unwilling to bend and flex to new understandings or new demands, it needs to be stressed that the state may well (as it already has in selected instances) intervene to reform the very nature of acceptable and allowable local zoning authority. States do not need to, nor necessarily want to, do this. But they do want to achieve certain objectives. If local authorities will not act to realize these objectives voluntarily, then changes may be forced upon them.

Yet it is also true that the state-local relationship is far from one sided, and any pressure for change does not have a pre-determined outcome (as was seen from the experience of the quiet revolution in the early 1970s). The local community has several things working in its favor in the reform process. Among the most important are institutional and legal precedents. In the early 20<sup>th</sup> century, states made



the decision to devolve authority to local communities and, for the most part, have allowed them substantial leeway since then. And the courts in most states have largely stood behind local control. And even where there is a strong push for zoning reform, there is a paradox. Reformers all live somewhere; they are themselves locals. They need and want zoning to work in their own local communities. So while they are calling for reform, they are also in the role of local landowners and local citizens using zoning to achieve a range of land-use and social objectives. These factors allow local communities substantial space to “push back” and seek a mutually agreeable, negotiated reform process.

Recommendations for education and negotiated dialogue may seem naïve in this time of extreme political polarization. But planners often hold a unique position in local governments, especially with regard to zoning, where their knowledge and expertise give them a credibility that other actors in the process may not hold.

The most likely path forward is that local officials and citizens will be resistant to change. They know what they know, and they know how to make what they know work for what they want to achieve. But zoning in 2023 is not zoning in 1973, or zoning in 1923 (this should be another part of the local education process). Zoning changed, often pushed by state mandates reflecting new social, economic, and political circumstances. It was not uncommon for local communities to not like the changes, and they often resisted them. But they also (mostly) came around to living with them (they had no choice). But local zoning still exists and, obviously from the various proposals for reform, is irksome to many. As Haar and Wolf declared, “Euclid lives.”

Does local zoning in 2023 need a nudge, even a shove? Yes. Will locals like it? No. But will the real world outcome be somewhat of a cat-and-mouse game between reformers and locals, between state-imposed standards and local implementation? Yes. Is there any realistic alternative? I don’t think so.

## Conclusion

Zoning does not need to become extinct, and it shouldn’t. It serves an important function and useful purpose. A stark reminder of this was brought forth in late November 2022 when a devastating landslide struck the Italian island of Ischia, brought on by torrential rain and subsequent flooding. The landslide was literally deadly, 11 people, including a newborn and several children, perished. The landslide washed away houses and buried streets. In its aftermath, residents and officials sought to identify the root cause of such horrific damage. One immediate hypothesis was the extent of illegal construction that had occurred through the years, much of which has been “legalized” in waves of amnesties. According to one resident quoted in a *New York Times* story about the landslide’s aftermath, it was centrally about the lack of land-use control. As he said: “We have no zoning plan since the 1960s. Politicians have never decided where residents can build here. There is no way to build legally” (Pianigiani 2022).

Zoning needs to do what it has done for over 100 years—to adapt to changing legal standards, social norms, and economic realities. Zoning can do this. And zoning, and the land-use regulation community, will be better for it.

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## About the Author



Harvey M. Jacobs is a retired professor of urban and regional planning and environmental studies from the University of Wisconsin-Madison and from Radboud University

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