

November 27 2012

Mark Green, Chair
Alameda County Transportation Commission
1333 Broadway, Suite 300
Oakland, CA 94612

Re: Detailed Grant Guidelines for One Bay Area Grant Program

Dear Chair Green and Alameda CTC Commissioners:

We are writing to follow-up on our October 1st letter recommending ways to incorporate affordable housing and neighborhood stabilization into ACTC's One Bay Area Grant (OBAG) implementation plan. We are pleased that staff has included "*Affordable Housing Creation and Preservation*" among the scoring criteria for OBAG projects; however, we urge you to increase the weighting given to these criteria in order to make them a meaningful part of the scoring process.

The staff proposal for the OBAG grant guidelines (Item 7B for the November 19, 2012 Policy, Planning and Legislative Committee packet) increases a project's score if it is in a jurisdiction that has strategies to preserve and create affordable housing. Unfortunately, projects can only earn up to 3 points for such policies, while the total maximum project score on all criteria is 100 points. This is simply too low a number of points to make a difference in a project's ranking and fails to reflect the critical nature of affordable housing creation and anti-displacement efforts to a successful transit-oriented development (TOD). Moreover, we are disappointed that affordable housing creation and affordable housing preservation were combined into one category, as each is a distinct and important goal with different policy solutions.

In order to address these issues, we recommend that you incorporate into the *Affordable Housing Creation and Preservation* category, three separate criteria, that together can earn a city at least 15 points. These are:

- 1) Past affordable housing production,
- 2) Future affordable housing production, and
- 3) Current affordable housing preservation (including anti-displacement strategies).

We would be more than happy to work with the Board and staff on identifying how best to re-allocate the points amongst the policy-goal related scoring criteria. We believe it is entirely feasible to increase the weight given to affordable housing issues while maintain other important goals including project delivery/readiness and achieving VMT reduction through access to affordable and frequent transit.

Expanding the scope of the *Affordable Housing Creation and Preservation* criteria will recognize a more full range of affordable housing and neighborhood stabilization efforts

by cities to address housing needs within the PDAs. Attachment A lays out a way that these criteria could be implemented to both reward cities for creating equitable and transit-supportive TOD while also giving them the flexibility they need to address the particular housing challenges facing their cities.

We look forward to continuing to work with you on developing the OBAG guidelines as well as the long-term PDA Growth and Investment Strategy for the benefit of all of Alameda's residents, our economy and environment.

Sincerely,

The Equitable TOD Coalition:

Asian Pacific Environmental Network (APEN)
Building Opportunities for Self-Sufficiency (BOSS)
Causa Justa::Just Cause (CJJC)
Center for Sustainable Neighborhoods
Congregations Organizing for Renewal (COR)
East Bay Asian Local Development Corporation (EBALDC)
East Bay Housing Organizations (EBHO)
Genesis
Greenbelt Alliance
Public Advocates
St. Mary's Center
TransForm
Urban Habitat

Attachment A: Equitable TOD Coalition One-Page Proposal for Alameda County's OBAG Guidelines re: Affordable Housing Creation and Preservation

Cc: Art Dao, Executive Director of Alameda CTC
Beth Walukas, Direct of Planning, Alameda CTC
Tess Lengyel, Deputy Director of Policy, Public Affairs and Legislation

Attachment A: Equitable TOD Coalition One-Page Proposal for Alameda County's One Bay Area Grant Guidelines re: Affordable Housing Creation and Preservation

Alameda CTC, within the One Bay Area Grant (OBAG) program, is charged with developing grant criteria as well as a long-term plan for the development of the County's Priority Development Areas in order to achieve the climate change goals of SB375. In deciding how to allocate OBAG funds, Alameda CTC *must* "favorably consider projects in jurisdictions with affordable housing preservation and creation strategies or policies."¹ This requirement is grounded in the recognition that strategies to address affordable housing creation and preservation within Priority Development Areas (PDAs) and Transit-Oriented Development (TOD) projects are vitally important to the Bay Area's environmental and economic health as well as to meeting equity goals.²

The following are proposed criteria within the OBAG grant guidelines that will help Alameda CTC to select the best projects and reward cities that are taking the strongest steps toward ensuring that the County's neighborhoods best-served by transit remain affordable to existing residents, promote increased transit ridership, and accommodate a diverse mix of future residents. We recommend using three distinct criteria to assess and reward "affordable housing preservation and creation": 1) Past Affordable Housing Creation, 2) Plans for Future Affordable Housing Creation, and 3) Current Affordable Housing Preservation. Cities, upon application for OBAG funds, should demonstrate their past and future efforts to create and preserve affordable housing in their PDAs and can earn points on these three criteria:

Past Affordable Housing Creation (Affordable Housing Record)	Future Affordable Housing Creation (Planning for Mixed-Income Communities)	Affordable Housing Preservation (Community Stabilization/Anti-Displacement)
<p>Description: Jurisdictions have a track record of producing and/or facilitating the creation of affordable housing.</p> <p>Metric: Progress toward meeting RHNA goals for lower income housing allocations in the last two Housing Element cycles.</p> <p>Additional points for: Production of deeply affordable housing for extremely-low and very low-income populations, service-enriched, supportive or transitional affordable housing and/or housing for people with special needs: such as seniors, formerly homeless people, foster youth, and people with disabilities.</p>	<p>Description: Jurisdictions have plans and policies in place that will support the future development of affordable housing within the PDA .</p> <p>Metric: Measured by the existence of zoning and policies that are supportive of affordable housing.</p> <p><u>Example policies could include:</u> density bonuses, inclusionary housing requirements, impact fees, reduced parking ratios in exchange for affordable housing, rehabilitation of existing affordable housing, and affordable housing overlay zones.</p> <p>Additional points for: Within the PDA, plans for higher proportions of affordable housing for extremely low, very-low and low-income residents than required to meet RHNA goals.</p>	<p>Description: Jurisdictions have a plan to preserve existing housing affordability and to prevent the direct or indirect displacement of low-income residents in the project area,</p> <p>Metric: Measured by the existence of policies and programs that preserve affordable housing and prevent displacement.</p> <p><u>Example policies could include:</u> preservation of existing affordable & deed-restricted housing with extended affordability mechanisms, rental assistance, relocation assistance and relocation benefits, enforcement of tenant protections in foreclosed properties, right of return and right-of-first refusal policies, limits on condo conversions, just cause for eviction ordinance, and requiring one-for-one replacement of low-income or assisted units removed by TOD/PDA projects.</p>

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Comments Received on Draft OBAG Programming Guidelines

December 4, 2012

#	Commenter	Comment	Response
1	The Equitable TOD Coalition (letter dated 11/27/12)	Increase the weighting given to the "Affordable Housing Creation and Preservation" criteria in the OBAG project selection process. Increase the weighting given to at least 15 points.	There are a number of criteria that are used to evaluate certain characteristics and land use policies in the project location. Of these, whether or not a project is located within an area with supportive affordable housing policy is one criterion. Increasing the weight of this criterion requires reducing the weight of another criterion. This necessitates a broader discussion of all criteria related to project location.
2	The Equitable TOD Coalition (letter dated 11/27/12)	<i>Past Affordable Housing Production</i> Propose measuring progress toward meeting RHINA goals for lower income housing allocations or measuring the production of "deeply affordable" housing	The PDA Investment & Growth (PDA I&G) Strategy planning objective policies (Appendix A-6 of Resolution 4035) focus on ABAG provided information regarding the progress of local jurisdictions in implementing their housing element objectives and consideration of local housing policies or strategies that encourage affordable housing production and/or community stabilization in the short term (May 2013). Future updates of the PDA I&G Strategy Plan will include additional information including assessing local jurisdictions RHNA efforts (May 2014 and beyond). Collecting the information required to assess recent housing production at the PDA level will be considered through the 2014 PDA I&G Strategies Plan effort. This criteria could be considered in a future programming cycle. Staff will consider the existence of policies and programs regarding Preventing Displacement, Increasing Supply, and Preserving Existing Affordable Housing to evaluate this criteria.
3	The Equitable TOD Coalition (letter dated 11/27/12)	<i>Future Affordable Housing Production</i> Propose considering existence of supportive zoning and policies to measure an agencies effectiveness	Staff concurs with the method of evaluation for this criteria. Staff will consider the existence of policies and programs regarding Preventing Displacement, Increasing Supply, and Preserving Existing Affordable Housing to evaluate this criteria.

#	Commenter	Comment	Response
4	The Equitable TOD Coalition (letter dated 11/27/12)	<p><i>Affordable Housing Preservation</i></p> <p>Propose considering existence of supportive policies and programs to measure an agencies effectiveness</p>	<p>Staff concurs with the method of evaluation for this criteria. Staff will consider the existence of policies and programs regarding Preventing Displacement, Increasing Supply, and Preserving Existing Affordable Housing to evaluate this criteria.</p>