



2015-2016 AHSC Program Update and Final Draft Guidelines

Summary of Public Workshops and Feedback**Overview of Attendance:**

Location	Date	Number of Attendees
Sacramento, CA	October 19, 2015	32
Los Angeles, CA	October 21, 2015	88 22 (via videoconference)
Oakland, CA	October 23, 2015	64
Fresno, CA	October 26, 2015	34

- Total of In-Person Attendees: 240
- Total Comment Letters: 110

Summary of Comments:

The following represent the most common concerns from the public, across both Workshops and Comment Letters:

- **Geographic distribution of funds:** Commenters expressed a desire to see geographic targets for funding in order to ensure geographic equity. Various regional allocations were suggested.
- **Definition of rural:** Many stakeholders communicated their gratitude for the creation of the Rural Innovation Project Area (RIPA). However, they expressed the desire to expand the definition of rural to one that is more inclusive than the current methodology used by the Tax Credit Allocation Committee (TCAC) that would include fringe and unincorporated communities. Additionally, public comment letters stated a desire to increase the set-aside from 10% to 20%.
- **Parking:** Several of the comment letters articulated that funding available for parking under current Draft Guidelines disadvantages jurisdictions which already have low parking requirements in place, as a percentage reduction in parking spaces is difficult to achieve in those jurisdictions. Additionally, commenters expressed that the definition of "base zoning" needs clarification.

- **Minimum Award Amount:** Under the current Draft Guidelines, applications are required to request at least \$1 million in AHSC funds. Stakeholders commented that this requirement is unrealistic for smaller projects, especially in rural areas.
- **MPO Role:** Public comment letters voiced a desire to see a more clearly defined and substantial role for MPOs, particularly in the application review and decision-making process.
- **Anti-Displacement Measures:** Many of the comment letters received expressed concern that the current Draft Guidelines award points for anti-displacement measures that are already required under State Relocation Assistance Law. Stakeholders communicated that they would like to see this as a threshold requirement and instead place more emphasis on economic anti-displacement measures.
- **WalkScore/BikeScore:** Stakeholders commented that the use of WalkScore/BikeScore in the scoring criteria disadvantages changing communities, as the tools do not account for planned or recent bike/pedestrian infrastructure improvements. Commenters communicated their desire for AHSC guidelines to require a narrative to describe amenities in the area in place of the WalkScore/BikeScore tools.
- **Issues with Low-Income Housing Tax Credits**
 - **Emphasis on 4% and Loan Limit Amounts:** Understanding the push to utilize 4% over 9% tax credits, public comment letters articulated that stakeholders feel a \$50,000 loan limit is not sufficient for projects that provide deeper affordability.
- **Developer Experience:** Especially for smaller jurisdictions, comments mentioned that many developers may not have had two projects in the last five years given the funding climate. Recommended expanding experience window to 10 years.
- **Co-Applicants and Joint & Severally Liable:** Comment letters articulated that having a joint and severally liable requirement prevents co-applications from moving forward, and places a barrier in areas where there is mixed capacity to co-apply for AHSC.
- **Housing and Transportation Collaboration:** Similar to the point above, comments expressed concern over the 10 points allocated for collaboration, mentioning that agencies are still in the beginning phases of forming these partnerships.
- **Application & Timelines:** Efforts to streamline and simplify were acknowledged, but comments still expressed frustration over a complicated application due in a short timeline. Requests also included longer NOFA periods for concept and full applications to be completed, as well as early access to application for applicants to prepare appropriately.
- **Definitions of Transit:** Stakeholders explain that the threshold to meet the definition of High Quality Transit is too high, and will bump many areas out of TOD into ICP. They claim this is an issue because transportation infrastructure is there, and the need is really for the affordable housing resources prioritized in TOD. Additionally, comments also requested that the definition for Qualifying Transit be expanded to include “Dial-a-Ride” options.

- **CalEEMod GHG Quantification:** The application of caps in the amount of GHGs a project can reduce by place type (i.e. suburban, urban, urban core, etc.) limits the ability of project to demonstrate their true GHG reduction potential. Additionally, concerns were raised around the definition of a “job center” and a need to have more gradation in this definition (currently set at 5,000 jobs per square mile across all place types). Finally, stakeholders mentioned that active transportation, urban greening, and solar and energy efficiency still needs to be better accounted for in CalEEMod
- **GHG Reduction Points:** Comments mention that the changes made to the amount of points awarded for GHG reduction will always favor larger projects. This could present a conflict with smaller infill and suburban/rural projects.
- **Technical Assistance:** Stakeholders would like to see pool of technical assistance recipients be extended beyond those that applied in Round 1, with an emphasis on providing TA to Disadvantaged Communities.