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**REDEVELOPMENT AGENCY
OF THE CITY OF OAKLAND**
AGENDA REPORT

TO: Office of the City/Agency Administrator
ATTN: Deborah Edgerly
FROM: Community and Economic Development Agency
DATE: July 8, 2008

RE: **Annual Report Regarding the Former Oakland Army Base from the West Oakland Community Advisory Group (WOCAG)**

SUMMARY

The West Oakland Community Advisory Group (WOCAG) is the official venue for community discussion of the planning and development of the former Oakland Army Base. In February 2007, WOCAG was restructured so that it is an advisory body to the Agency Administrator – but with the ability to present an annual report to the Agency Board. WOCAG has submitted its 2008 Annual Report to the Agency; and staff is forwarding the Report to the Agency Board for its review – see **Attachment A**.

FISCAL IMPACT

There is no fiscal impact associated with this report.

BACKGROUND

In 1996, the Oakland Base Reuse Authority (OBRA) established WOCAG as part of the federal process for community reuse planning for the former Oakland Army Base. After OBRA's approval of the Final Reuse Plan for the Oakland Army Base in 2002, WOCAG continued to be actively involved in the Army Base development issues that affected the West Oakland community.

In 2006, OBRA was dissolved and its assets and obligations were transferred to the Oakland Redevelopment Agency. With the dissolution of OBRA, WOCAG did not have a legislative body to report to, or any formal legal status. At its meeting of February 27, 2007, the Agency Board endorsed a plan by the Community & Economic Development (CEDA) to reconstitute WOCAG as an advisory body to the Agency Administrator. Under the new structure, WOCAG reports to the Agency Administrator and has the opportunity to submit at least one report a year to the Agency Board.

WOCAG retained its current membership, with new members appointed by the Mayor as vacancies arise. The intent is to maintain a composition of WOCAG members who represent a wide variety of community concerns that relate to the development of the former Oakland Army Base. WOCAG members represent a wide variety of stakeholder groups, including

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environmental activists, West Oakland businesses, retired base and port worker, seniors, neighborhood activists, and other groups.

KEY ISSUES AND IMPACTS

Since its inception, WOCAG has provided a community perspective on a variety of issues connected with development of the Oakland Army Base. WOCAG members provide a voice on the potential impacts and opportunities arising from Army Base development, including air quality, traffic and public safety, suitable land uses for the Agency's Gateway Development Area (GDA) at the former base, jobs and job training, economic development, and community benefits. Many members are experts in their fields and contribute that expertise to the process. WOCAG is charged with providing input on the following issues:

- Review of proposals resulting from Oakland Army Base Exclusive Negotiation Agreement (ENA) projects;
- Development of the West Oakland Community Fund;
- Recommendations regarding the development of the former Army Base property.

WOCAG has timed the release of its annual report to coincide with the Agency Board's process to select a development strategy and Master Developer for the GDA.

WOCAG's report discusses several evaluation criteria that they recommend the Agency use when considering development projects for the GDA. These criteria include: green and sustainable development, workforce development, Port growth and opportunities, entrepreneurship, remediating past industrial impacts, regional growth, and government revenues (see Attachment A).

The report also discusses several issues related to community participation in the Army Base planning process. These issues include: extending the life of WOCAG and making adequate funding available for the public oversight process; and requiring a Community Benefits Agreement and a Public Participation Plan. Finally, the report discusses alternative strategies to generate sales tax, the use of other sites outside of the Army Base, and the future implementation of the West Oakland Community Fund (See Attachment A).

SUSTAINABLE OPPORTUNITIES

Economic: The attached report discusses issues relating to the generation of high-quality jobs and tax revenue; the retention and expansion of local businesses; and the maximization of land values as part of the overall development strategy for the Oakland Army Base.

Environmental: The attached report discusses issues relating to the environmental remediation of the Army Base; improvements to the waterfront; and the development of an urban in-fill site.

Social Equity: The attached report provides an important source of community input into the process for selecting a development strategy and Master Developer for the Army Base.

DISABILITY AND SENIOR CITIZEN ACCESS

This report does not involve the approval of any specific projects or programs. Disability and senior access issues would be addressed when specific development plans are submitted to the City by a developer for review and approval.

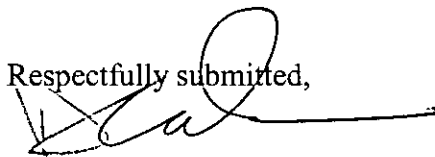
RECOMMENDATIONS AND RATIONALE

Staff recommends that the Agency receive the attached WOCAG Annual Report – as contained in Attachment A – and that the Agency consider WOCAG’s recommendations during the process to select a development strategy and Master Developer for the Gateway Development Area.

ACTION REQUESTED OF THE CITY COUNCIL/REDEVELOPMENT AGENCY

Staff requests that the Agency accept the attached 2008 Annual Report from the West Oakland Community Advisory Group.

Respectfully submitted,



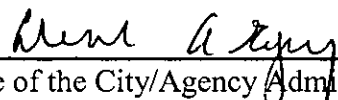
Dan Lindheim, Director
Community and Economic Development Agency



Reviewed by: Gregory Hunter
Deputy Director, Economic Development and
Redevelopment

Prepared by:
Alex Greenwood
Urban Economic Coordinator, Redevelopment Division

APPROVED AND FORWARDED TO
THE COMMUNITY AND ECONOMIC DEVELOPMENT COMMITTEE:


Office of the City/Agency Administrator

Attachment A: 2008 Annual Report of the West Oakland Community Advisory Group to
the Oakland Redevelopment Agency

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Attachment A:

**WOCAG 2008 Annual Report Regarding the
Former Oakland Army Base**

West Oakland Community Advisory Group

**The Official Forum for
Public Input on the Oakland Army Base Reuse Plan**

Community Recommendations for reuse of the City of Oakland “Gateway” Development Area

June, 2008

Report Subcommittee:

George Bolton, Chair
Richard Neveln
Steve Lowe
Mary Lake
Ray Kidd
Brian Beveridge

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1.0 INTRODUCTION

The West Oakland Community Advisory Group (WOCAG) began as part of a structured response to the actions of the Base Realignment and Closure Commission (BRAC), set up by congress in the early 1990's. In 1993 and 1995, the BRAC selected military bases to be eliminated in Oakland.

The East Bay Conversion and Reinvestment Commission (EBCRC) was established to study the base closure process and included regional elected officials and consultants. At this time, a regional quasi-governmental body, the Oakland Base Reuse Authority (OBRA) was established. Membership included county, state and congressional representation, as well as, the Mayor of the neighboring city.

Formal community involvement was a requirement of the BRAC process and requirement was met in Alameda with the U.S. Navy's Base Reuse Advisory Group (BRAG), a committee including residents and policy-makers. It would be a couple of years before the community involvement process would get started at the Oakland Army Base (OAB). The Oakland Army Base had a Remediation Advisory Board (RAB), and the community advisory group was to be formed from a broad spectrum of stakeholders including West Oakland residents.

Services and a community improvement fund supported by base development were and remain important criteria for OAB reuse. Other issues including, homeless services, a job skills training center, green industry and a regional recycling center, all originated with the WOCAG member recommendations.

In 2006, title to approximately 170 acres of the Oakland Army Base transferred to the City of Oakland with the Community & Economic Development Agency (CEDA) as the managing agency. With the transfer went approximately \$24 million in revenues and operating funds. Strong community effort convinced the Council that a community advisory group was still needed and, considering the institutional knowledge within the advisory group, having the WOCAG report to CEDA and the City Administrator made sense. The WOCAG was, however, defunded, no longer having resources for administration, documentation, reporting, technical advisors, or even soft drinks at meetings.

The past year saw the "Community Fund" account created, but not funded. The Community Fund was to be funded by contributions of \$2 million each from the City and Port of Oakland, but the process was changed by Council and responsibility for this investment was shifted to the yet to be selected "Master Developer". As of May, 2008, the community still waits for the funding of the Community Fund.

Community collaboration for cooperative problem-solving is the legacy of West Oakland, and of the WOCAG. It is from the high ideals of base reuse, nearly 15 years ago, that the opportunities to mitigate the damage done, by freight movement, industrial activities and the base closure itself, to the residents of West Oakland arise. The Oakland City Council is in the position to make these dreams of Oakland's long-overburdened working poor a reality by assuring that the reuse of the Oakland Army Base creates

quality, stable job opportunities for residents of Oakland's flatlands and eliminates the deadly impacts of the trucking and logistics industry in our residential neighborhoods. For over a decade, the volunteers to the WOCAG have dedicated themselves to these solutions. We implore our policy-makers to finally do their part.

1.1 WOCAG TIMELINE

1993 –

- Ron Dellums appointed Chairman, House Armed Services Committee by Congress,
- Base Realignment and Closure Commission (BRAC) is formed within this committee
 - Charged with the duty to cut military spending by closing five California military Bases.
- The Oakland Base Reuse Authority (OBRA) is formed representing Oakland city and Alameda County policy makers,
 - Tasked with negotiating timing and management of federal funds for a planned diversion of services related to the Army Base closure.
 - and to meet with the community to strategize in preparation of that closure.

1996 –

- OBRA Governing Board established WOCAG, unique in its focus on to provide a community forum specific to the Oakland Army Base reuse plan.

June 2006 –

- OBRA Governing Board authorized the transfer of OBRA's assets, liabilities, and responsibilities to the Redevelopment Agency, and approved of its own dissolution.

With the dissolution of OBRA, the WOCAG is temporarily without a legislative body to report to, and has no legal status. The continuation of WOCAG allows community input and involvement in the planning of future development projects for the Army Base, and it provides a means of communication between the Agency and the West Oakland Community.

July 2006 –

- The Director of the Community and Economic Development Agency (CEDA) on behalf of the Agency Administrator, adopted WOCAG as a community advisory body to the Agency administrator for a period of 3 years, with a reduced size of 16 members.
- City of Oakland agenda defines the mission of the West Oakland Community Advisory Group (WOGAG) like this:

“ WOCAG will provide community feedback regarding development of projects at the Oakland Army Base, will report to the Agency Administrator and will provide annual status reports to the Agency Board. WOCAG will provide input regarding:”

- Proposals resulting from the Oakland Army Base Exclusive Negotiation Agreement Projects
- The West Oakland Community Fund Proposal
- Recommendations to the Agency Administrator regarding the development of Army Base property

February 2010 –

- WOCAG will cease to exist unless extended by the Agency Administrator.

We, the West Oakland Community Advisory Group (WOCAG), believe the Gateway Development Area at the former Oakland Army Base to be a major development opportunity for the City of Oakland, its residents and the Oakland business community. The effect of this development, if done properly will attract more people to our magnificent city in support of business and residency. With this in mind, we submit this report.

2.0 Project Evaluation Criteria

2.1 Green and Sustainable Development

- Incorporate green development practices
- Development sustainable business plans for post-development operation

The Gateway site should be a showcase for green development of the most innovative kinds, including green construction and materials reuse, manufacturing product design and recognition of the OAB's vital role in the East Bay Green Corridor development plan. OAB redevelopment should unite contiguous Bay Area water fronts using a comprehensive strategy for job development, transportation and "Smart Growth." Such a comprehensive plan will take into account the needs of residents, workers and consumers without creating additional air and other quality of life impacts for surrounding neighborhoods. In fact, OAB redevelopment must function to remediate the existing burden of industrial impacts on West Oakland and other flatland neighborhoods in the City.

Such integrated planning will help build a sustainable future for the OAB, and support Oakland's goal of becoming a leader among "green municipalities." Oakland is a regional leader in the development of LEED certified commercial and public buildings and the OAB development should continue on that path. The use of products made with salvaged, recycled, or agricultural waste content, building designs that conserve natural resources avoid indoor toxics and outdoor emissions, and save energy are both technically and economically feasible and must be make requirements of the OAB Master Developer and any sub-area developers.

2.2 Workforce Development

- A new job base
 - Stable, not seasonal
 - Linking skills development and entry level opportunities
 - Trades and career path jobs

The OAB must be viewed as an opportunity to pursue sustainable job creation and economic development which provides both basic employment and career-track advancement opportunities for Oakland residents and businesses.

As we are seeing in the national economic downturn, consumerism alone will not support a steady and sustainable middle class. While retailing may provide an attractive jobs-per-acre ratio, the actual jobs tend to be lower wage, entry level positions with little opportunity for advancement and a high sensitivity to seasonal shopping cycles. Oakland can little afford to jump into head-to-head competition with its neighboring cities for retail shopping malls, all the while ignoring our greatest blue-collar economic driver: the Port of Oakland.

Our local workforce development experts, from "life-skills" preparation to community college and trade skills training services, know how to prepare workers for steady, career track industrial jobs. We must incorporate these local worker training assets into the plan for redevelopment of the OAB. Developers

are not job training experts. It is the responsibility of Oakland's Redevelopment and Economic Development departments to make the connections that put Oaklanders to work in stable, sustainable jobs.

Traditional jobs in logistics and freight handling will "go green" as this industrial sector accesses and initiates new methods and technologies for freight tracking and emissions reduction. New technologies for passive energy generation and reduction of truck miles traveled, just to name two opportunities, are already available in the marketplace. If space is made available, research and development, green product manufacturing, and other as yet unimagined entrepreneurial opportunities for new jobs in Oakland will fill our army base.

2.3 Port Growth and Opportunities

- Support for Port operations
 - AMS (ancillary maritime support)

The Port of Oakland is widely considered the "economic engine of Oakland and the Bay Area. Port revenue growth, while maintaining its exiting footprint requires consideration of operational efficiency in the transportation and logistics industrial cluster. Public health, freeway congestion management and homeland security are all vital considerations for OAB redevelopment.

Hazardous cargo inspection near the Port is a critical public safety issue. New inspection containment facilities are needed to protect both workers and local neighborhoods from the deadly potential presented by chemical, biological and explosive cargo.

Near-port staging areas for in-bound regional cargo could aid in scheduling of freight transport over existing freeways and rail lines during non-commute time. This will also reduce idling on the freeways and reduce congestion near and around our nascent "Transit Village" movement

- Limit new non-worker traffic generation

The Oakland Army Base is a hazardous industrial site due to its adjacency to the Port of Oakland and the East Bay Municipal Utility District. In spite of its adjacency to several freeways and the new Oakland Bay Bridge.

2.4 "Opportunity Oakland" – entrepreneurship

- Create opportunities for existing Oakland businesses
 - Business expansion

Many existing Oakland businesses need room to grow, to increase revenues and hire more Oakland workers. Some of Oakland's own, like trucking, warehousing and logistics companies create unacceptable health and safety conflicts in our neighborhoods, but need to have close access to the port. The alternative is more freeway congestion and potentially hazardous cargos traveling around and through our city. The OAB is industrial, it is near the Port and large enough for a well thought-out efficient industrial and business part development.

- Businesses displaced from impacted neighborhoods

Added weight should be given to development proposals that actively seek truck-related businesses located in West Oakland, for example, Truck services and parking, recycling and the produce wholesalers, which would leave their former sites available for more appropriate, i.e. lower impact commercial use.

CEDA should seek such exchange and relocation opportunities to better coordinate area-wide planning efforts for West Oakland residential areas and the Jack London District.

2.5 Remediating a Legacy of Injustice

- Reduce legacy of industrial impacts on West Oakland residents
- Relocation of inappropriate businesses to the OAB can eliminate legacy health impacts and free up land for neighborhood serving uses like retail or light industry.

Recycling is a critical link in the waste reduction chain for Oakland and the region. A very significant portion of Port of Oakland export cargo is scrap paper and metal bound for Asian ports. However, our recyclers have, in most cases, proven to be poor neighbors to Oakland's flatland residents. Idling trucks, trash, vermin, odors, toxic air emissions, blight and the complex social problems associated with homelessness and substance abuse are all daily experiences of residents living near Oakland recycling centers. These Oakland citizens, many home-owners and tax payers, deserve intervention and relief.

The recycling industry need not be an eyesore or a health risk. Modern recycling facilities, located appropriately, will more effectively support our city's "zero waste" goals. Models for such facilities are available and should be explored by CEDA.

2.6 A Role in Regional Growth

- Implications of OAB redevelopment in broader regional development.

- The Green Corridor

Primary reuse of the OAB would ideally be geared toward industrial job creation through ancillary maritime services, renewable energy and green manufacturing. The OAB is an essential element of the new East Bay Green Corridor, which holds the potential of connecting the Port of Richmond and the Port of Oakland along the backbone of the common rail line. Both cities, and all those in between will soon face common impacts from rail expansion on local urban development if expansion of our freight movement sector is not viewed from a regional perspective.

- Broadway Retail Corridor

Moribund Main Streets across America are too numerous to count; strangled by the diversion of shoppers to suburban malls located at the edge of town. Oakland must avoid the schizophrenic planning scenario in which we pursue a "10K" campaign to bring residents to our urban center and then develop automobile-centric shopping malls. The potential for a revitalized Broadway corridor will be

stillborn if a retail/entertainment complex is created on the OAB. As with the starvation of retail districts across the country, a consumer shopping center at the OAB could have negative impacts on Oakland for decades to come.

- District/Neighborhood Economic Revitalization Visions

There is no better examples than \$5 gasoline, recent fatal truck collisions and two hour commutes to demonstrate the need to keep people out of their cars by providing needed goods and services in the neighborhoods; within walking distance or a short bus ride of home. Oakland must develop strategies to revitalize its local District commerce.

2.7 Government Revenues at the OAB

The City of Oakland has an urgent need for sales tax revenues to support General Fund activities. The “Gateway Development Area” has been seen by many to offer a solution to this need through the creation of a large, region-serving retail shopping facility. Unfortunately, all serious propositions of this sort to date, specifically the Wayan’s Brothers retail/entertainment complex, and a Costco big-box retail outlet, have ended in the projects being withdrawn. The Wayan’s team invariably came to understand that their customers will not enjoy views of San Francisco and the bay, but of container ships, loading cranes, trucks and freight trains. In the case of Costco, the City rightly refused to give the land away at a fraction of its value. Oakland Community Economic Development Agency must be more creative in its efforts to meet the critical government revenue needs of our city, and simultaneously cultivate our tradition retail corridors.

OAB developments should support, not compete with, other Oakland retail zone development initiatives, i.e. Broadway Corridor, Jack London Square and the Coliseum Area and Transit Village retail areas.

Site appropriate retail on the OAB should be designed to serve the needs of the new workforce there without attracting excess consumer traffic. Quite a wide variety of retail offerings can be imagined that would provide convenience and needed services to a logistics and R&D worker population.

Restaurants, catering and other food services might thrive. Retail business support services like copying, printing and binding, electronics equipment and office supplies, even convenience stores are typical assets of well-designed industrial parks.

CEDA should explore opportunities for larger general consumer retail along other major traffic corridors in City Districts.

3.0 Community Participation

3.1 Keeping a public eye on the Process

Maintaining the WOCAG as an on-going oversight group ensures that the public remains “at the table” throughout the development process, that changes to the development plans are true to the original criteria, and that commitments made early on are followed through.

Community partnering is not only an excellent opportunity but an absolute need to ground any developer's vision for the Base and ensure that real benefits such as jobs, air quality mitigation, traffic congestion management, reduced industrial blight, and sustainable local commercial districts are attained by West Oakland's residents as swiftly as possible.

In order to be meaningful, this public oversight process must be funded, either from tax increment funds from the redevelopment area or by the Master Developer. It defies equity, justice and any measure of “reasonableness” to expect volunteer advisory bodies to contribute the level of administrative effort and professional expertise required to provide meaningful insight and participation in processes as complex as the redevelopment of the Oakland Army Base. This process should be drawn in parallel to the West Oakland Project Area Committee's oversight of the West Oakland Redevelopment area.

3.2 Community Benefits Agreements

In the spirit of the original land transfer vision, a public process to define community benefits specific to West Oakland should be convened. In addition, Oakland residents and tax-payers across the city deserve a clear statement of their Return On Investment for turning over this significant opportunity to private enterprise.

Numerous groups, with long histories of meaningful commitment to the community, already exist and should be engaged in a formal relationship with any OAB Master of Sub-area Developer. The WOCAG and WOPAC (West Oakland Project Area Committee) are obvious choices for a comprehensive community planning approach. Other well-established technical and advisory groups like the Asthma Coalition, West Oakland Neighbors and the Environmental Indicators Project represent important, informed voices with a perspective on community need and community benefits. Several significant research studies, including the California Air Resources Board West Oakland Health Risk Assessment, can provide a solid, fact-based footing for analysis of community need.

From Boston's “Big Dig” to Los Angeles' Staple Center, numerous examples exist of formal Community Benefit Agreements, which have secured the rights of project neighbors and helped reduce conflict with developers, allowing redevelopment to move ahead more efficiently.

3.3 Public Participation Plans

A Formal Public Participation Plan is most appropriate for a project of this scale and should include clear provisions for funding of staff to support the WOCAG in its oversight role.

Other extensive redevelopment projects across the country, like the Staple Center development in Los Angeles, have demonstrated the critical importance of having a formal public participation process and clearly defining project benefits to the community from the outset. The investment in process more than pays for itself in the reduction of challenges to the project and delays in construction.

4.0 Recommendations

4.1 Alternative Paths to Sales Tax Revenues

4.1.1 Revitalizing the Urban Core with Downtown Retail

As the condos of the Harris and Brown eras rise Uptown, Downtown and all around the Broadway corridor, gridlock looms on the near horizon unless Oakland finds ways to keep the new “Downtown 10K” out of their cars. This can only be achieved by providing “what the people want” within walking, biking or mass transit distance of where the people live.

4.1.2 Apprising Other Opportunity Sites

Many off-site opportunities for sales tax generation could be achieved through creative industrial land swapping. Alternative opportunities to create retail sales tax revenue streams that simultaneously support district economic revitalization should be explored. Such opportunities might include:

- A property swap with EBMUD could create a much more significant development parcel in conjunction with the Sullivan property at W. Grand and Mandela Parkway.
- Smaller land exchanges in West and East Oakland could make way for local, neighborhood-serving retail opportunities. National economic data demonstrates that the majority of jobs are created by businesses with less than 20 employees.
- Additional weight given, during project plan evaluation, to developers who proactively seek out truck-related businesses in West Oakland for inclusion in OAB developments.
- Addition land swaps with the Port of Oakland may offer better opportunities to support more consumer friendly retail developments.

Neighborhood retail districts also hold the potential for reducing freeway congestion, eliminating the need to commit land to extensive parking facilities, and reduce per capita VMT (vehicle miles traveled). There are added public health benefits to be derived when neighborhood residents have walking access to the needs of daily life.

Neighborhood-serving retail is pivotal to the goals of “smart growth,” energy independence, public health and should be a core element of Oakland’s “green city” vision. However, the creation of large retail development at the edge of the City bode ill for shopping elsewhere and carries with it the same damaging potential brought by most suburban shopping malls, which often spelled the end of “Main Street, USA.”

4.1.3 The Real “Gateway to Oakland”

The West Grand and Grand Avenue corridor represents the only significant street-level entry into Oakland. From any freeway, I-580, I-880 or I-980, the Grand Avenue corridor is the true “Gateway to Oakland”. The Uptown development vision has, intentionally or inadvertently, created a new and significant crossroads at West Grand Avenue and Broadway. How the City approaches retail development at the Oakland Army Base will have a permanent, and potentially

debilitating, impact on the revitalization of Oakland's core, from Uptown to Jack London Square.

West Grand Avenue holds the potential for a vibrant and beautiful mixed-use urban corridor with thriving region-serving retail as significant as any boulevard of its kind in the Bay Area. Parts of Geary Boulevard in San Francisco come to mind, as do similarly scaled areas in Seattle, Portland and Vancouver. It makes little sense to abandon our urban corridors to ramshackle work/live spaces and industrial blight while struggling to attract middle-class shoppers to our most heavily industrialized areas.

Whatever plan is eventually chosen for reuse of the OAB, esthetic value is important to such a visually prominent site and should reflect Oakland's unique and diverse mix of blended culture, regional economic value and vision of the "Model City."

4.1.4 The West Oakland Community Fund

The legally mandated West Oakland Community Fund must receive the four-million dollars required from the City and Port. Much time and significant interest payments have been lost in delaying funding of the account, which was created in 2006 to avoid legal penalties. OAB developers must be required to submit their pro-rata share of the Community Fund resources at the time of project initiation.

The Community Fund should be a sustainable resource to the people of West Oakland, not a short term source for grants. The WOCAG believes that funds should be distributed in the form of low-interest, or interest free, loans to support West Oakland entrepreneurship and neighborhood economic revitalization.

Examples of existing programs that may serve as models are:

- Oakland Business Development Corporation's Green Business Loan Fund
- Community Bank of the Bay's Green Business Loan Fund
- Alameda Count's Recycling Revolving Loan Fund

Fund allocation should be determined by a WOCAG committee with oversight and advice from the community at large. Criteria and a process for applying for project funding support shall be created by the community fund committee, with advice from the Redevelopment Agency and third-parties as determined by the committee members. A non-profit fiscal sponsor shall be employed to provide accounting and technical support services as defined by the fund management committee. The fiscal sponsor shall be chosen by the committee with input from the Redevelopment Agency. Administrative costs for the fund should not exceed 8% - 10%. Interest on participant loans should be designed off-set program costs.