



# AGENDA REPORT

**TO:** Edward D. Reiskin  
City Administrator

**FROM:** Christina Mun,  
Interim Director, Housing  
and Community  
Development

**SUBJECT:** Acquisition And Conversion to  
Affordable Housing (ACAH) Re-  
Authorization

**DATE:** October 20, 2022

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City Administrator Approval 

Date: Nov 3, 2022

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## **RECOMMENDATION**

**Staff Recommends That The City Council Adopt A Resolution (1) Allocating Up To \$12,265,543 From Affordable Housing Trust Funds, Low And Moderate Income Housing Asset Funds, And Measure KK Bond Funds To The Acquisition And Conversion To Affordable Housing (ACAH) Program; (2) Allocating Additional Funds In An Amount Not To Exceed \$10,000,000 From Affordable Housing Trust Funds And Excess Redevelopment Bond Funds To The ACAH Program, For A Total Amount Not To Exceed \$22,265,543 Contingent Upon The City Not Receiving A Funding Award From The State Of California Homekey Program; And (3) Authorizing The City Administrator To Fund Loans Under The ACAH Program Without Returning To Council.**

## **EXECUTIVE SUMMARY**

The purpose of this resolution is to request the allocation of up to \$22,265,543 in funds for the Acquisition and Conversion to Affordable Housing (ACAH) Program from the following funding sources: Affordable Housing Trust Funds including Affordable Housing Impact Fees, Jobs Housing Impact Fees, and "Boomerang Funds," Low and Moderate Income Housing Asset Funds, Excess Redevelopment Bond Funds, and Bond Measure KK funds. The actual amount of funds available for the ACAH Program will range between \$12.3 million and \$22.3 million, contingent on a pending State of California Homekey Program funding award.

The ACAH program provides loans to eligible borrowers for acquisition (and where necessary, rehabilitation) costs associated with protecting and preserving long term affordability of housing throughout the City of Oakland (City), by acquiring existing market rate rental properties, and placing long-term affordability restrictions the properties.

As such, this resolution also requests authority to fund the loans under the ACAH program without returning to the City Council (Council), to enable staff to close loans more quickly in response to the demands of the real estate market.

## **BACKGROUND / LEGISLATIVE HISTORY**

The purpose of the Acquisition and Conversion to Affordable Housing (ACAH) Program is to protect and preserve long term affordable housing options throughout the City by providing loans to eligible borrowers to acquire market rate rental properties, and then convert the properties to long-term affordable housing through recorded affordability restrictions.

The ACAH program has been bifurcated into two subprograms to help meet the program's goals: one program sets aside funds for community land trusts/limited equity housing cooperatives, and another sets aside funds for all types of affordable housing developers.

Staff intends to issue a Notice of Funding Availability (NOFA) similar to previous rounds of the ACAH Program in the Fall of 2022, to continue a set aside for the community land trusts/limited equity housing cooperatives and another for all types of affordable housing developers.

Furthermore, the following Department of Housing and Community Development (HCD) values continue to guide the funding priorities for the ACAH Program:

- Advance racial equity;
- Assist housing projects where the tenants are at risk of displacement and in neighborhoods experiencing heightened levels of gentrification;
- Assist housing projects that target assistance towards extremely low-income households; and
- Assist housing projects that help to respond to the impacts of the COVID-19 pandemic.

### ***Legislative/Funding History***

The ACAH Program was formerly known as the Site Acquisition Program but was renamed and revised in 2019 after receiving input from community stakeholders and considering best practices in the affordable housing field. The program was updated to be more efficient in protecting and preserving affordable housing opportunities in the City, which has been key for preventing further displacement of residents. The Site Acquisition Program was one of the original programs authorized for funding in 2017 with proceeds from the first tranche of Measure KK bonds, and together the two programs have been successful in increasing affordable housing units according to the Measure KK Affordable Housing and Infrastructure Bond Law. The legislative history of the ACAH and Site Acquisition Program is further described below.

On November 8, 2016, Oakland voters passed Measure KK, the Affordable Housing and Infrastructure Bond that provided \$100 million in funding for affordable housing. On November 29, 2016, the City Council approved Ordinance No. 13403 C.M.S.<sup>1</sup> that enacted the City of Oakland Affordable Housing and Infrastructure Bond Law. In accordance with the Bond Law, affordable housing programs prioritized strategies, programs and projects that increased the supply of affordable housing for those who are homeless and households most vulnerable to

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<sup>1</sup> City of Oakland - [File #: 16-0340](#) (legistar.com)

displacement, including extremely low-income renters, limited income seniors, veterans, and people with disabilities.

On June 19, 2017, the City Council approved Resolution No. 86774 C.M.S.<sup>2</sup> identifying the programs that are authorized for funding with proceeds from the first tranche of Measure KK bonds in an amount of \$55 million, which included The Site Acquisition Program. While originally intended to be a short-term revolving loan program, as program implementation got underway, it was clear that the properties would require long-term loans to be feasible. As a result, the program shifted and City Resolution 87220 C.M.S.<sup>3</sup> modified the Site Acquisition Program to allow for long-term loans on June 5, 2018.

On June 24, 2019, Oakland City Council passed the 2019-2021 Budget with \$12 million allocated to a Preservation of Affordable Housing Fund (PAHF). The goal of the PAHF is to help community land trusts and limited equity housing cooperative acquire and preserve properties with 25 units or less. City staff incorporated this Council directive into the ACAH Program and used Bond Measure KK funds for the PAHF. However, additional funding for the PAHF has not been allocated through the budget process in subsequent years.

As mentioned above, on September 12, 2019, City Council approved Resolution No. 87876 C.M.S.<sup>4</sup> to rename the Site Acquisition Program to the "Acquisition and Conversion to Affordable Housing (ACAH) Program," to improve its ability to prevent displacement and preserve affordable housing in Oakland neighborhoods. The ACAH program was also given authorization to release up to \$30 million over the counter without returning to Council, which has now largely been utilized. Lastly, on December 10, 2019, City Council approved Resolution No. 87981 C.M.S.<sup>5</sup> authorizing additional funding under Measure KK for the ACAH Program.

The programmatic changes made in 2019 and 2020 as the Site Acquisition Program transitioned to the ACAH Program included:

- Limiting eligible projects to existing properties only (acquisition of vacant land was no longer eligible even if affordable housing was being constructed on the land)
- Implementing a competitive NOFA process to prioritize areas of Oakland facing the most extreme displacement pressures, properties with rent burdened and/or vulnerable households facing eviction pressures, properties in substandard conditions and/or projects sponsored by emerging developers.

### ***Past Program Commitments and Expenditures***

The Site Acquisition Program, later renamed as the Acquisition and Conversion to Affordable Housing (ACAH) Program, has been funded by Measure KK Affordable Housing Bond funds (Fund 5331 and Fund 5333) which were issued through Notices of Funding Availability (NOFA) in 2017, 2019 and 2020.

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<sup>2</sup> City of Oakland - [File #: 16-1229](#) (legistar.com)

<sup>3</sup> City of Oakland - [File #: 18-0514](#) (legistar.com)

<sup>4</sup> City of Oakland - [File #: 18-2222](#) (legistar.com)

<sup>5</sup> City of Oakland - [File #: 18-2515](#) (legistar.com)

**Table 1** below summarizes program expenditures from the 2017 Site Acquisition Program and the two ACAH NOFAs in 2019 and 2020. A total of \$45,839,372 has been awarded thus far under these programs, funding 460 affordable housing units. As of August 1, 2022, approximately \$38.4 million has been expended on projects.

Of the remaining \$7.4 million that has been committed but not yet spent, approximately \$1.9 million will be spent on rehabilitation needs of projects that have previously closed their ACAH loans, and \$3.4 million is committed to four projects that anticipate closing their ACAH loans in late 2022 or early 2023. One (1) project (with a funding commitment of \$1.7 million) is currently pursuing additional financing and the closing date has yet to be determined.

**Table 1: Site Acquisition Program and ACAH Program Awards & Expenditures as of 8/1/22**

Year/Program	Total Amount Awarded	Total Amount Spent	Balance Remaining to Spend	Total Affordable Units
2017 Site Acquisition (Fund 5331)	\$15,649,150	\$15,649,150	\$0	215
2019 ACAH NOFA (Funds 5331&5333)	\$23,840,222	\$21,415,617	\$2,424,605	187
2020 ACAH NOFA (Fund 5333)	\$6,350,000	\$1,355,250	\$4,994,750	58
<b>Site Acquisition + ACAH Total</b>	<b>\$45,839,372</b>	<b>\$38,420,017</b>	<b>\$7,419,355</b>	<b>460</b>

Starting in 2019, the ACAH Program was bifurcated into two subprograms to establish a set-aside for community land trusts and limited equity housing cooperatives after Council passed the 2019-21 Budget, which allocated \$12 million to the Preservation of Affordable Housing Fund (PAHF). **Table 2** shows the breakout of projects and funds by subprogram: *Community Land Trusts & Cooperatives Subprogram* and *All Developers – General Pool Subprogram* from 2019 through present.

**Table 2: ACAH 2019-2020 NOFA by Subprogram**

ACAH 2019-2020 by Subprogram	Projects	Total Amount Awarded
<i>Community Land Trusts &amp; Cooperatives</i>	9	\$12,000,000
<i>All Developers - General Pool</i>	5	\$18,000,000
<b>2019-2020 ACAH Total Projects Awarded Funds</b>	<b>14</b>	<b>\$30,000,000</b>

As of August 2022, five out of the nine projects in the *Community Land Trusts & Cooperatives Subprogram* have closed their ACAH loans. The remaining four projects are in various stages of predevelopment and will likely close their loans in late 2022 or early 2023. In the *All Developers-General Pool*, four out of the five projects have closed their City loans; the remaining project needs to secure additional financing before closing. Since all funds allocated to the ACAH Program have been committed at this time, additional funding is needed to continue this important and impactful program.

### **ACAH Unit Affordability and Resident Demographics**

As demonstrated in **Table 1** above, the Site Acquisition and ACAH Programs have funded 215 units and 245 units, respectively, for a total of 460 affordable units. All units are restricted to households at or below 80 percent Area Median Income (AMI). Compared to the City's other affordable housing programs which typically allow household incomes up to 60% AMI, the ACAH Program allows for households up to 80% AMI for the following reasons:

- 1) ACAH projects tend to be smaller than new construction or substantial rehabilitation projects, and as a result, less rental revenue is generated to cover operating expenses;
- 2) Operating subsidy is not available from the Oakland Housing Authority for ACAH projects, which typically subsidizes lower income rents;
- 3) Fewer other sources of non-City funds are available for these projects, limiting the funds available for rehabilitation or an operating reserve.

Although the ACAH Program allows households with incomes up to 80 percent of AMI, program sponsors report that the income of the existing tenants is often much lower than 80 percent of AMI. As these projects complete their rehabilitations and verify the income of existing tenants, the City will have more complete data on the tenant incomes in the ACAH Program.

**Table 3** shows race and ethnicity demographics as reported for a portion (267 of 460) of the ACAH Program units as of October 2022. The data available is limited because the City receives demographic information only once property rehabilitations are complete and the housing units are occupied. Furthermore, data currently available is reported by property owners at the household (HH) level for the following race and ethnicity categories combined. City staff continue to refine reporting methods to better understand program impacts and improve equitable access to housing for Oakland individuals and families.

**Table 3: Race and Ethnicity of Households in ACAH Program Units**

Asian HHs	Black HHs	Latinx HHs	Native American/Alaskan Native HHs	Native Hawaiian HHs	White HHs	Other HHs	Decline to State	Total
24	55	109	1	2	33	6	37	<b>267</b>
9%	21%	41%	0.4%	0.7%	12%	2%	14%	<b>100%</b>

The data available shows approximately 41% of the households are Latinx or of Hispanic origin, approximately 21% of the households are Black, 12% are White, and 9% are Asian. Remaining households include those of other or mixed race/ethnicities (2%), Native American/Alaska Native (0.4%), Native Hawaiian/OPI (0.7%), and the 14% who declined to state/did not report.

### **Ensuring Timely Release of Funds**

Staff is requesting that the City Administrator be authorized to fund acquisition loans under the ACAH Program without returning to the City Council for approval, since the program funds the purchase of real estate within the open real estate market and requires rapid approval of eligible applications to secure properties and avoid further price increases through speculation. The City Administrator had this authority for the Measure KK Site Acquisition Program in FY 2017-18,

and again under the ACAH Program in 2019-2020. This enabled staff to close loans more rapidly, thereby better meeting the demands of the competitive real estate market.

## **ANALYSIS AND POLICY ALTERNATIVES**

The ACAH Program has been impactful through the preservation of conversion of 460 units to long-term affordable housing, as shown in Table 1 above. The Program has awarded over \$45 million through three NOFA cycles, which has resulted in the acquisition and conversion of over 450 units. The ACAH Program is a critical tool in the City's work to prevent displacement and stabilizing affordability for Oakland neighborhoods facing the pressures of rising market rents. Due to the severe shortage of affordable housing and skyrocketing rents throughout the City, the demand continues for this type of anti-displacement/preservation program.

### ***Alignment with HCD Strategic Action Plan***

In accordance with the May 2021 Council approved HCD's 2021-2023 Strategic Action Plan<sup>6</sup> (SAP), HCD identified program priorities for addressing housing affordability with a funding strategy in which roughly half the department's affordable housing funding will be directed towards acquisition and rehabilitation of affordable units (preservation). Through the NOFA process, HCD staff will recommend awards for additional ACAH projects for the rehabilitation and preservation of existing affordable housing, and the conversion of unregulated housing to restricted affordable housing.

The SAP further identifies both the intended use of funds available to the HCD to undertake the mission of reducing homelessness, rent burdens for Oakland residents and the disparity between funding available and the local need for affordable housing; particularly extremely low-income housing for households earning at or below 30 percent of area median income (AMI).

### ***Timely Release of Funds Without Returning to Council***

As mentioned above, staff requests the City Administrator be authorized to fund site acquisition loans under the ACAH Program without returning to Council for approval, to enable staff to close loans more quickly in response to the demands of the real estate market. Ensuring the timely release of funds will enable Staff to better address housing needs within the City by meeting the citywide priorities of increasing affordable housing opportunities and preserving existing affordable housing.

## **FISCAL IMPACT**

Approval of the proposed resolution will authorize the allocation of funds in an amount not to exceed \$22,265,543 for affordable housing projects under the ACAH Program. Funding sources will include Affordable Housing Trust Funds (AHTF) in the form of Affordable Housing Impact Fees, Jobs/Housing Impact Fees and "Boomerang Funds," along with Low and Moderate Income Housing Asset Funds, Excess Redevelopment Funds and Bond Measure KK Funds.

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<sup>6</sup> City of Oakland: <https://cao-94612.s3.amazonaws.com/documents/HCD.final.21-21Strategic-Plan.pdf>

The amount of funds available for the ACAH Program through this recommendation will range from a minimum of \$12,265,543 to a maximum of \$22,265,543. As described below, this range in funding amounts is intended to provide maximum flexibility to staff to assist borrowers in acquiring and restricting affordable units in several possible funding scenarios.

The funds available for ACAH are contingent upon a funding award from the State's Round 3 Homekey Program (award announcements anticipated in summer or fall 2023). Based on whether the City is awarded these funds, the amount of funding available for the ACAH Program may increase. A description of the ACAH funding sources is listed below, along with the potential funding scenarios contingent upon the anticipated State Homekey award (see **Table 5**).

### ***Funding Sources for the ACAH Program***

- 1) Affordable Housing Trust Fund (AHTF) (Fund 1870): This fund is made up of the following sources:
  - a. Affordable Housing Impact Fees (AHIF) (Project 1001674, Org 89929): The Affordable Housing Impact Fee is assessed on construction of new market-rate housing units including live/work and work/live units per Chapter 15.72 of the Oakland Municipal Code and is set aside for affordable housing development uses.
  - b. Jobs/Housing Impact Fees (JHIF) (Project 1001664, Org 89929): The Jobs/Housing Impact Fee is assessed on construction of buildings for office and warehouse/distribution uses per Ordinance No. 12242 codified as Chapter 15.68 of the Oakland Municipal Code.
  - c. Boomerang Funds (Project 1000386, Org 89929): "Boomerang funds" are former property tax increment financing payments that are received by the City and specifically designated for affordable housing. In 2013, after the dissolution of redevelopment, the City committed to setting aside 25 percent of the funds distributed to the City as a taxing entity under the Redevelopment dissolution and deposit them into the Affordable Housing Trust Fund.

Note: Each of the sources under the City's Affordable Housing Trust Fund (AHTF) Fund 1870, including the AHIF, JHIF, and "Boomerang" funds, has different expenditure and re-use requirements, and HCD fiscal staff are pursuing the establishment of individual funds for these sources.

- 2) FY 2021-22 Low- and Moderate-Income Housing Asset Fund Balance (Fund 2830, Project 1000388, Org 89929): The Low- and Moderate-Income Housing Asset Fund (LMIHAF) is a fund required under the Redevelopment Dissolution law to hold funds generated from housing assets (such as land sales or loan repayments) transferred to the City from the former Redevelopment Agency when the Agency dissolved. The current fund balance is from loan repayments received by the City from existing rental or ownership properties and from redevelopment funded Mortgage Assistance Loans.
- 3) Measure KK (Funds 5331 & 5333): Bond Measure KK is an Affordable Housing and Infrastructure Bond that was approved by Oakland voters in 2016 that provided \$100 million in funding for affordable housing programs. On November 29, 2016, the City



Council approved Ordinance No. 13403 C.M.S. that enacted the City of Oakland Affordable Housing and Infrastructure Bond Law. This funding source is nearly completely committed to projects, and funds available are limited.

- 4) Excess Redevelopment Bond Funds (Funds 56XX, Project TBD, Org 89929): Per the redevelopment dissolution law, the Oakland Redevelopment Successor Agency (ORSA) was permitted to spend "excess" bond proceeds (i.e. pre-2011 tax allocation bond proceeds). Excess proceeds include future excess bond proceeds or income received on bond-funded projects. This may include land sale proceeds, lease revenue, and loan principal and interest payments. The spending must comply with bond covenants. While these particular bond funds come from the Central District redevelopment project area, redevelopment law allows these funds to be used outside of the project area for affordable housing, since affordable housing anywhere in the City of Oakland is considered a benefit to the Central District project area. ORSA transferred its excess bond proceeds to the City in 2013 via a Bond Expenditure Agreement between ORSA and the City. In alignment with the Bond Spending Plan for the use of excess redevelopment bond funds adopted by City Council on December 15, 2020, through Resolution No. 88459 C.M.S.,<sup>7</sup> up to \$3,904,705 has been made available from excess bond fund proceeds for the City's Homekey Program and other affordable acquisition projects. If the City does not receive a Round 3 State Homekey award, \$600,000 of the Excess Redevelopment funds for Homekey may be redirected to the ACAH Program.

#### ***Anticipated State Homekey Award to Impact Funds Available for ACAH***

The City is anticipating a State Round 3 Homekey Program funding award announcement in summer or fall 2023. The Homekey Program requires matching funds be set aside for the program to be allocated contingent upon receiving a funding award, which will be used to sustain and rapidly expand housing for persons experiencing homelessness or at-risk of homelessness. Should the City not be awarded the State Homekey funds from this round, the City's matching funds set aside for the program shall be reallocated to the ACAH Program. Combined, the proposed capital match sources for Round 3 Homekey projects include allocations of up to \$17,396,203 of Affordable Housing Impact Fees, Boomerang funds, Excess Redevelopment Bond funds, and Low and Moderate Income Housing Asset Funds, as described in Resolution No. 89379 C.M.S.<sup>8</sup> approved by City Council on July 26, 2022. Should the capital match sources not be used for Homekey this round, \$10 million of the \$17.3 million will be redirected to the ACAH Program.

**Table 5** below shows two funding scenarios contingent upon the upcoming State funding award for the Homekey Program. Based on these scenarios, the minimum amount of funding that will be available for the ACAH Program is \$12,265,543 under Scenario A, and the maximum amount of funding that will be available for ACAH is \$22,265,543 under Scenario B. Scenario A shows the base amount of funds currently available for the ACAH Program without the Homekey match funds, whereas scenario B shows an additional \$10 million of the match funds set aside for the City's Homekey Program redirected to the ACAH Program.

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<sup>7</sup> City of Oakland - [File #: 20-0839](#) (legistar.com)

<sup>8</sup> City of Oakland - [File # 22-0607](#) (legistar.com)



**Table 5: Funding Scenarios**

<b>Funding Source</b>	<b>Scenario A: (No Homekey Match Funds for ACAH)</b>	<b>Scenario B: (Homekey Match Funds to ACAH)</b>
<b>Affordable Housing Impact Fees (AHIF) - 1870</b>	-	\$3,400,000
<b>Jobs/Housing Impact Fees (JHIF) - 1870</b>	\$1,953,241	\$1,953,241
<b>Boomerang Funds - 1870</b>	\$3,000,000	\$9,000,000
<b>Low &amp; Moderate Income Housing Asset Fund (LMIHAF) - 2830</b>	\$3,294,714	\$3,294,714
<b>Measure KK Funds - 5331 &amp; 5333</b>	\$4,017,588	\$4,017,588
<b>Excess Redevelopment Bond Funds - 56XX</b>	-	\$600,000
<b>Total Potential Funds from Sources Combined</b>	<b>\$12,265,543</b>	<b>\$22,265,543</b>

HCD plans to issue an ACAH NOFA in December 2022 assuming the minimum amount of funds available per Scenario A (\$12,265,543). If additional funds become available per the other scenarios, those funds will be awarded to the ACAH projects in the pipeline that have met the minimum requirements of the program yet had not received a funding commitment through the ACAH NOFA, or the additional funds may be used towards the 2023-24 ACAH NOFA round.

**PUBLIC OUTREACH / INTEREST**

Leading up to the creation of the HCD's Strategic Action Plan, approved by Council on June 1, 2021, the HCD Director and staff met with many community stakeholders. A clear outcome of those discussions centered around the need for more resources for housing preservation and production overall.

Over the years, the ACAH program was guided by consultation and feedback from various affordable housing stakeholders, specifically those advancing and advocating for anti-displacement efforts in rapidly gentrifying neighborhoods in Oakland. Staff are in process of scheduling another listening session with stakeholders and ACAH sponsors to incorporate feedback into the next ACAH NOFA.

All ACAH NOFAs are released via email to approximately 150 interested parties from an HCD mailing list that includes developers, affordable housing advocates, architects and contractors, as well as other parties who have expressed interest in City funding opportunities for affordable housing. After the NOFA is released, City staff host informational sessions to guide applicants through the NOFA process and answer any questions.

## **COORDINATION**

This report and resolution have been reviewed by the Office of the City Attorney and by the Budget Bureau.

## **SUSTAINABLE OPPORTUNITIES**

The awarded ACAH funds will finance affordable housing projects that will address the following sustainability priorities as follows:

***Economic:*** Projects financed by ACAH funds will generate construction, professional and social services, and ongoing property management jobs in Oakland. Providing families with affordable housing provides financial stability for extremely low-, very low-, and low-income households.

***Environmental:*** By acquiring and converting existing units for affordable housing, pipeline projects will utilize existing resources and structures, reducing the need for new materials and alleviating the pressure to build on vacant, suburban or rural land far from public transit and proximity to Oakland jobs.

***Race and Equity:*** Affordable housing is a fundamental means of achieving greater social equity. Projects financed by ACAH funds will provide housing stability for tenants. The investment of ACAH funds into pipeline projects will invest in the development of quality affordable housing for extremely low-, very low-, and low-income residents.

**ACTION REQUESTED OF THE CITY COUNCIL**

Staff Recommends That The City Council Adopt A Resolution (1) Allocating Up To \$12,265,543 From Affordable Housing Trust Funds, Low And Moderate Income Housing Asset Funds, And Measure KK Bond Funds To The Acquisition And Conversion To Affordable Housing (ACAH) Program; (2) Allocating Additional Funds In An Amount Not To Exceed \$10,000,000 From Affordable Housing Trust Funds And Excess Redevelopment Bond Funds To The ACAH Program, For A Total Amount Not To Exceed \$22,265,543 Contingent Upon The City Not Receiving A Funding Award From The State of California Homekey Program; And (3) Authorizing The City Administrator To Fund Loans Under The ACAH Program Without Returning To Council

For questions regarding this report, please contact Meg Horl, Housing Development Coordinator, HCD, at [mhorl@oaklandca.gov](mailto:mhorl@oaklandca.gov) or 510-238-6171.

Respectfully submitted,

*Christina Mun*

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