

ClimatePlan



Strategic Growth Council
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May 31, 2022

Dear Program Manager Caswell and Program Associates Wilburn, DeWaele, and Lopez:

On behalf of the undersigned organization, we respectfully submit these comments on the Round 7 Guidelines for the Affordable Housing and Sustainable Communities Program (AHSC). These comments address the proposed changes to fund only electric buildings (G3), and strengthen anti-displacement strategies required in the program (K2, K3, and K4).

Comments on policy G3: All electric buildings; AHSC will no longer fund projects that include natural gas.

We support this proposal for AHSC to only fund all electric buildings. This is a vital step to reduce greenhouse gas emissions from single family homes and make these homes safer.^{1 2} Additionally, because AHSC targets affordable housing for extremely low and low income communities, we see this baseline as a way to ensure these communities are not left behind from sustainable and climate friendly solutions. However, we recognize that navigating the construction and policy for all electric buildings can be complex and time and resource

¹ Mahone, A., Li, C., Subin, Z., Sontag, M., Mantegna, G. (2019). "Residential Building Electrification in California: Consumer economics, greenhouse gases, and grid impacts." *Energy and Environmental Economics, Inc.*

² CARB. (n.d.) "Indoor Air Pollution from Cooking." *CARB*. Web. Retrieved from: <https://ww2.arb.ca.gov/resources/>

consuming.³ We recommend that staff in anticipation of this, increase technical assistance for projects that are unfamiliar with all electric building policies.

Comments on policy K2, K3, and K4: Anti-displacement strategies

We support the changes for K2, K3, and K4, but have some recommendations for K3 and K4 to ensure that the guidelines select strong and community driven anti-displacement strategies.

- **K2: Community based partnerships: Projects with a signed memorandum of understanding with a community based organization to partner with affirmative marketing plan will be eligible for points (1-2 points)**

We support this change because this incentivizes collaboration between agencies and communities, helps build capacity and ensures outreach efforts reach underserved communities.

- **K3: Restructuring the anti-displacement strategies section: take out and repurpose “local policies” and “business” anti-displacement strategies.**

We support the restructuring of the anti-displacement section. When reviewing the section in the Round 6 guidelines for [ClimatePlan’s Transportation Report Card](#), it was not apparent that these strategies addressed community needs.⁴ For instance, a just cause eviction policy or improvement of tenant stability beyond required law, while strong, will not be useful if communities are unaware of their rights.

However, while we agree that “local” policies reflect the concerns listed previously, we believe that some of the business anti-displacement strategies are useful and can remain in the section. We recommend restructuring the section to include the list of voluntary strategies, and there being a separate business section.

- **K4: Strengthen accountability of Anti-displacement strategies: applicants will be required to select strategies from an updated list of voluntary strategies to be funded by the project (ex: tenant legal counseling and plans developed through collective impact efforts).**

We are supportive of this change. Focusing on voluntary strategies can ensure there is accountability and enforcement. But, we urge AHSC staff to clarify that these strategies

³ Borgeson, M. and Sampath Kumar, S. (2020). “Pathway to New All Electric Low Income Housing in CA.” *NRDC*. Web. Retrieved from

<https://www.nrdc.org/experts/merrian-borgeson/pathway-new-all-electric-low-income-housing-ca> .

⁴ Cheng, N. (2022). “California Funding Transportation Report Card.” *ClimatePlan*. Web. Retrieved from <https://www.climateplan.org/reportcard>.

are selected with the community and that AHSC staff is looking for the sustainability of these strategies, to ensure it is not one-time.

With the urgency of the climate crisis, all investments must be ambitious, meaningfully reduce greenhouse gas, and set all of our communities up for a sustainable, healthy future. We see these changes as vital for AHSC to move integrated solutions forward. We appreciate the staff's time and commitment to improving this program.

Sincerely,

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