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COPC: First-Year Consolidated Plan in the Bay Area -- A Review

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University of California at Berkeley
Institute of Urban and Regional Development

FIRST-YEAR CONSOLIDATED PLANS IN THE BAY AREA — A REVIEW

I. INTRODUCTION

HUD's consolidated plan requirement, first published in draft form in the August 5, 1994, *Federal Register*, has the potential to be the most significant change in HUD local planning requirements since the adoption of the "workable program" requirement in the 1950s. Whether or not this potential is realized will depend on a combination of factors — how consistent HUD is in continuing to emphasize the consolidated plan and associated process, how budget cuts and program reorganization play out, and perhaps most importantly, how seriously local governments choose to take comprehensive strategic housing and community development planning.

On its face, the Consolidated Plan is simply a combination of four heretofore separate sets of planning documents: (i) Community Development Block Grant (CDBG) plans and reporting requirements; (ii) Emergency Shelter Grants (ESG) applications; (iii) the Comprehensive Housing Affordability Strategy (CHAS), which is the basis for federal grants under the HOME Investment Partnership program; and (iv) grant applications under the Housing for People with Aids program (HOPWA). The "consolidated" part of the requirement occurs only at the local level, through the combined preparation of local plans and applications documents. At the federal level, program appropriations, budgets, administration, and grant disbursements all remain separate.

Behind this simple requirement for a single planning document is a longer-term agenda to improve the efficiency and responsiveness of local housing and community development programs. To use a nursery rhyme metaphor, urban housing and community development plans are a little like Humpty Dumpty. Years of adopting separate programs and reporting requirements have left Humpty Dumpty in pieces and at the foot of the wall of local housing and community development efforts. The purpose of consolidated planning is to reassemble those pieces in the form of a well-thought-out, widely supported plan that provides guidance and direction. Putting a whole Humpty Dumpty back on top of the wall involves achieving five goals:

1. To promote closer programmatic and institutional coordination between local housing and community development planning efforts.
2. To improve programmatic coordination to promote the more efficient use of federal funds for housing projects.
3. To broaden community and interest group participation in the plan-making process.
4. To reduce the bureaucratic and paperwork aspects of local plans.
5. To make plans accessible to local populations.

This paper examines how well these goals are being met in the San Francisco Bay Area based on the first-year consolidated plans produced by 17 Bay Area jurisdictions and consortia (Alameda County HOME Consortium, Berkeley, Fairfield, Gilroy, Marin County, Mountain View, Napa, Oakland, Palo

Alto, Petaluma, Redwood City, San Francisco, San Mateo, San Mateo County HOME Consortium, Santa Clara County, Santa Rosa, and Sunnyvale). Because of its own progressive traditions, and because California planning law requires the preparation of detailed housing elements, the Bay Area has long been a recognized leader in developing housing plans, in adopting and implementing innovative housing and community development programs, and in developing affordable housing. In 1994, HUD designated two Bay Area cities, San Francisco and Oakland, as Enhanced Enterprise Communities. Bay Area communities have pioneered creative programs for homeless people and people with HIV/AIDS which link housing with social services, and, because California redevelopment law stipulates that at least 20 percent of local tax increment revenues must be used for affordable housing, California communities have considerable experience in relating redevelopment to housing and community development initiatives. If the purpose of consolidated planning is to be attained anywhere, it should be achieved in the Bay Area.

At the same time, the six-month timetable within which California communities were to prepare their first-year consolidated plans was extremely tight. Time was not the only problem. Because of California's ongoing economic problems, many local governments in California have had to reduce their planning staffs as well as their contributions to housing and community development programs. With the long-term future of many HUD programs (as well as HUD itself) in doubt, most California cities were reluctant to gear-up for a major new planning initiative. So, for many Bay Area communities, just getting a consolidated plan finished on time was an achievement. This review should therefore be seen as applying to the beginning of what is hoped will be an evolving and improving planning process — which will later result in improved documentation.

The remainder of this paper is organized into three parts. Part II reviews the current consolidated plan requirement and documents how consolidated plans differ from CHASes, their immediate predecessors. Part III reviews the content, organization, and quality of first-year Bay Area consolidated plans. Part IV concludes with a progress report on how well Bay Area communities appear to be meeting HUD's consolidated planning goals, as well as ideas for improving the consolidated plan requirement and process.

II. CONSOLIDATED PLANS: THE IDEA AND REQUIREMENTS

The Consolidated Plan combines the planning and application aspects of four previously separate HUD grant programs: (i) Community Development Block Grants, or CDBG; (ii) Emergency Shelter Grants, or ESG; (iii) federal grants under the HOME Investment Partnership program; and (iv) grants under the Housing for People with Aids program, or HOPWA. The Consolidated Plan document completely replaces the local Comprehensive Housing Affordability Strategy (CHAS) document, the local HOME program description, the Community Development Plan and final statement, and ESG and HOPWA applications. Low-rent public housing, enterprise community activities, FHA programs, fair housing, and other HUD housing and community development activities continue to have their own separate planning or certification processes.

Notice to implement the consolidated plan rule, and initial submission requirements and guidelines, were first published in the August 5th, 1994, edition of the *Federal Register*. The consolidated plan requirement applies to all entitlement community development jurisdictions, to all current recipients of HOME, ESG, and HOPWA grants, and to all states. It does not apply to local public housing authorities.¹ (It does, however, require the agencies preparing consolidated plans to consult with local housing authorities.) Nor is it necessary for consolidated plans to include detailed standards for affirmatively pursuing fair housing goals. Following prior CHAS procedures, neighboring jurisdictions may combine their individual consolidated plans into a consortium document.

Omitted from the formal consolidated plan rule (as published in the *Federal Register*) is any reference to specific objectives or purposes. Instead, the rule lists various goals for housing and community development programs in general.² Following a brief presentation of general goals, the rule lists four proposed functions of consolidated plans: (1) to serve as a planning document for the jurisdiction, which builds on a participatory process at the lowest levels; (2) to serve as an application for federal funds under HUD's formula grant programs; (3) to serve as a strategy to be followed in carrying out HUD programs; and (4) to serve as an action plan that provides a basis for assessing performance.³

To understand what HUD views as the purpose of its consolidated plan requirement, one must instead turn to various departmental guidelines and materials. HUD's primary objective in implementing the consolidated plan requirement is to streamline and simplify what has become a plethora of local planning and reporting requirements; that is, to reduce the planning paperwork required of local governments. (The irony of requiring a new local planning document in the name of reduced paperwork was apparent to all, HUD officials included.) In line with this purpose, and to make the consolidated plan start-up process easier, HUD officials have consistently encouraged communities to use their existing CHAS documents as the basis of the consolidated plan. As with the CHAS document, the consolidated plan is based in part on a series of standard data and program forms. For those communities that had not previously submitted CHASes, or otherwise lacked the data required to complete a consolidated plan, HUD made available, free-of-charge, appropriate (tract-level) housing and population data from the 1990 Census, as well as related data-mapping software.

HUD officials intend consolidated plans to be simpler to read, as well as easier to prepare. Consolidated plans are to be accessible to local citizens interested in or impacted by federally-funded housing and community development programs. As originally conceived, consolidated plans were to be as short as possible, illustrated with understandable graphics and maps, and written in English, not bureaucratese. Whereas the client for previous HUD documents, including the CHAS, had typically been the HUD Regional Office, HUD officials wanted consolidated plans also to be directed to the public. Seen in this way, the consolidated plan idea fits neatly into HUD's new "service-orientation," as first articulated in *Re-inventing HUD*.⁴

Yet to see consolidated plans simply as streamlined documentation is to miss a more fundamental point. Behind the consolidated plan concept is a much broader idea: that while individual housing and community development programs may be categorical and focused, planning should be collaborative and comprehensive. Thus, a second major purpose of the consolidated plan requirement is to "enable communities to view their HUD programs not as isolated tools to solve narrow functional problems, but rather as an invitation to embrace a comprehensive vision of housing and community development."⁵

The argument for taking a more comprehensive and collaborative approach to housing and community development planning is more than just rhetorical. Most of today's affordable housing projects and many community development projects are funded from multiple program sources⁶. Rather than taking a comprehensive view, project sponsors and managers must labor to balance the often inconsistent and sometimes incompatible requirements of different federal, state, and local funding sources.

Because it does not affect particular funding programs, the consolidated plan requirement will not change the ways housing and community development projects are funded — at least not in the first round.⁷ What it is supposed to do — by adding new planning requirements — is push communities to take a more comprehensive and cross-programmatic look at all of their housing and community development activities. Whether such requirements ultimately achieve this purpose, or simply get in the way, is a matter for empirical investigation.

Taking a comprehensive planning view would result in three types of efficiency benefits — or so HUD officials presume. The first would be to reduce the number of redundant or inconsistent projects. A second presumed benefit would be an increased level of coordination between projects, particularly with respect to supportive services. HUD especially stresses the value of inter-project coordination in advocating its continuum of care approach to providing services for the homeless.⁸ Finally, taking a more comprehensive view would allow cities to make more efficient use of particular program funds.

Behind HUD's argument for taking a more comprehensive approach is the assumption that current approaches to housing and community development are insufficiently comprehensive or collaborative — particularly within larger jurisdictions. Long-term land use planning usually falls under the province of planning departments, and is too rarely concerned with issues of housing affordability, immediate economic development, or community re-investment. In some places, the responsibility for community development lies with planning departments; in other places it rests in the mayor's office, the city manager's office, or lies with a redevelopment agency. In some cities, the responsibility for housing programs is assigned to planning departments. In others it rests with redevelopment agencies, or housing departments. Local housing authorities oversee projects funded under the low-rent Public Housing program and administer Section 8 certificates and vouchers. Most new assisted housing in the Bay Area is developed by non-profit housing development corporations which rely heavily on federal assistance but are independent of either local government or public housing authorities. Enterprise community and economic development activities are administered more or less independently of any

other housing and community development activities. The fact that housing and community development planning takes place within so many different institutional structures means that it is often fragmented and bureaucratic. HUD clearly hopes that opportunities for improved agency coordination will be found in the course of preparing a common document.

III. REVIEW OF FIRST-YEAR BAY AREA DOCUMENTS

This section reviews first-year consolidated plan submissions by 17 Bay Area jurisdictions and consortia.⁹ It is organized into four sub-sections: (i) a review of local needs assessments; (ii) a review of local participation and consultation practices; (iii) a review of local strategic plans; and, (iv) a review of local action plans. Each subsection reviews particular HUD consolidated plan requirements, discusses frequent and infrequent approaches and/or practices, presents exemplars, and discusses how well HUD's planning expectations are being met.

Assessing Needs

The first section of every consolidated plan is to be a five-year assessment of local housing needs. HUD guidelines are quite specific regarding what is to be covered. The plan must identify the housing assistance needs of extremely-low-, very-low-, low-, and moderate-income households by renter and ownership status, as well as numbers of households experiencing problems of substandard housing and overcrowding. Jurisdictions are to describe the nature and extent of homelessness, and to inventory existing homeless assistance facilities. The number, physical condition, and rehabilitation needs of local public housing units are to be estimated, as are the number of housing units with lead-based paint hazards. In addition, each jurisdiction must explain whether and how local public policies block the development of affordable housing units. Housing and homeless needs are to be summarized in a standardized form as Consolidated Plan Table 1 (Appendix A). Finally, as input into the Strategic Plan (see below), each jurisdiction must identify its "priority non-housing community development needs" for which CDBG funds may be used. These may include public improvements, public facilities, public services, and economic development activities.

With the exception of this last provision, the needs assessment requirement of the consolidated plan is almost identical to that of the CHAS. This was intentional. HUD officials believed most CHAS needs assessments to be adequate and, given the tight time frame for producing consolidated plans, did not want local housing planners conducting entirely new needs assessments. Indeed, many local housing planners were advised by HUD officials that they could insert their existing CHAS needs assessment directly into their consolidated plan.

The CHAS Baseline: Most consolidated plan preparers in the San Francisco Bay Area followed this advice. Of the 17 plans we reviewed, all based their consolidated plan needs assessment on existing CHAS documentation. A number of communities included additional information and analysis. For example:

- Berkeley went well beyond its CHAS to collect and analyze additional information on lead-based paint hazards, seismic hazards, and on needs for low-income rental assistance.
- Mountain View's consolidated plan includes a number of areas not covered in its CHAS, including: overcrowding, the housing needs of battered women, homeless facilities and needs, and the housing needs of special populations.
- Oakland's needs assessment is drawn directly from its CHAS. What's new is an extended section on economic and community development needs.
- Fairfield's consolidated plan, like Oakland's, includes a substantial discussion of specific community development needs. These include diversifying the local jobs base, providing assistance to small businesses, and addressing financial gaps in the marketplace. Also included is an analysis of community credit needs.

Housing and Homeless Needs: Despite their specificity, HUD guidelines give local jurisdictions considerable latitude in determining which housing needs they document, the numerical specificity of that documentation, and in projecting future housing needs. As a result, Bay Area consolidated plans vary widely in the extent and specificity of their housing needs assessments. Most Bay Area jurisdictions organized the narrative part of their needs assessments according to the categories specified by HUD. This makes them somewhat choppy and difficult to read. Information often seems to be presented for its own sake and without reference to actual needs present in a particular community. This sometimes makes it difficult to distinguish between current housing market conditions, areas of need as identified by HUD, and actual housing and homeless needs in the community.

Commonly identified areas of housing and homeless need included (Exhibit 1):

- All 17 of the consolidated plans we reviewed identified high housing cost burdens as a significant housing need. Most focused their discussions on the high monthly costs of rental housing; a few also examined the cost burdens associated with ownership. As required by HUD, almost all Bay Area jurisdictions tabulated rental cost burden by income level. About half also considered household size, composition, and race in their tabulations. Most Bay Area jurisdictions based their analyses of housing cost burdens entirely on the 1990 Census. Only three jurisdictions addressed projected affordable housing needs, and only two incorporated post-1990 information.
- All 17 of the consolidated plans we reviewed focused on the shelter needs of special needs populations, including the elderly and disabled, persons with AIDS/HIV, the mentally ill, single parents, and children. Within this broad needs area, the level of analytical detail varied widely. Mountain View stood apart from the pack for its detailed quantitative assessment of multiple special needs populations, including the elderly, large families, single-parent households, persons with physical and mental disabilities, persons with substance abuse problems, battered women, and persons with HIV/AIDS. In addition to estimates of the number of persons and households in each category, Mountain View's consolidated plan included specific assessments of housing unit and service needs.
- Fourteen consolidated plans identified homeless needs. As above, there was considerable variation in the level of detail provided. Napa, Palo Alto, and Marin County, for example, included detailed inventories of available homeless facilities and services. These included social service programs and facilities targeted to the currently homeless, as well as programs targeted toward populations at risk of becoming homeless. Unique among all 17 respondents, Marin County also included a detailed discussion of on-going homeless prevention strategies and programs.

Exhibit 1: 1995 Bay Area Consolidated Plans: Comparisons of Identified Needs

City or County	Identified Housing Needs													Homeless Needs			Community Development Needs	Used HUD Computer Package?	Document Clarity & Readability	
	Needs organized by	High cost burdens among low- and very-low income households	Attordable housing unavailable or existing	Lack of homeownership opportunities	Lack of housing opportunities for special needs populations	Overcrowding	Physically substandard units	Many units with lead-based paint	Racial discrimination in housing and credit markets	Other identified housing needs	Most needs derived from CHAS?	Shelter needs of existing homeless population	Significant population at risk of homelessness	Lack of services for homeless persons						
Alameda County HOME Consortium	Income & tenure	x	x	x	x	x	x	x							yes	x	x	Varies by city	no	fair
Berkeley		x	x	x	x		x		1. Earthquake vulnerability	yes	x	x	x	x	yes	x	x	Variety of neighborhood facilities and service needs; job-training and economic development.	no	fair
Fairfield	Income level	x	x	x	x		x			yes					yes	x	Economic development; youth and senior services; parks and infrastructure	no	fair	
Gilroy		x	x	x	x		x			yes					yes	x	No specific needs identified	no	fair	
Marin County (includes all cities)	Income and household type	x	x	x	x		x		1. Persons with AIDS and their families	yes					yes	x	No specific needs identified	no	fair	
Mountain View	Income & tenure	x					x			yes				yes	x	x	No specific needs identified	no	poor	
City of Napa		x					x		1. Elderly housing needs 2. Farmworker housing needs	yes					yes	x	Select public and social service community development needs	no	poor	
Oakland	Income level and household type	x					x		1. Public housing waiting lists	yes					yes	x	Economic development programs	no	fair	
Petaluma															x			no	poor	
Palo Alto	Household group	x					x			yes					x	x	No specific needs identified	no	fair	
Redwood City	Population group	x					x			yes					x	x	No specific needs identified	no	fair	
City of San Mateo	Income level	x					x			yes					x	x	No specific needs identified	no	fair	
San Mateo County HOME Consortium		x								no							Generalized public service and facility needs	no	fair	
San Francisco	Household type	x					x		1. Demand for live-work units 2. Housing for immigrant households	somewhat					x	x	Brief discussions of neighborhood facility, public space and services, and economic development needs	no	fair	
Santa Clara County (includes seven cities)	Income level and household type	x					x			no								no	poor	
Santa Rosa	Household types	x					x		1. Farmworker housing 2. Regulatory barriers to affordable housing	yes					x	x	Public facilities, services, and improvements, jobs, crime	no	good	
Sunnyvale		x					x			yes					x	x	No specific needs identified	no	fair	

- Twelve consolidated plans mentioned discussed the problem of lead-based paint. Most noted either that it was not a significant problem, or that they could not reliably estimate the number of households at risk.
- Twelve consolidated plans noted that significant numbers of residents were at risk of becoming homeless, usually because of a lack of affordable housing opportunities. As with the case of lead-based paint, few jurisdictions were able to produce numerical estimates of these risks.
- Ten jurisdictions noted that they lacked adequate non-housing services for the homeless. Eight jurisdictions identified overcrowding as a significant housing problem. Only four jurisdictions noted the presence of large numbers or shares of physically substandard units. Berkeley stated that overcrowding was not a significant problem.
- Eight communities (Oakland, Napa, Fairfield, San Francisco, Alameda County, Marin County, Palo Alto, and Santa Rosa) identified a need to expand homeownership opportunities, particularly for moderate-income households and potential first-time buyers.

A number of housing needs areas were addressed by a minority of Bay Area jurisdictions. Only four communities — Fairfield, Gilroy, Oakland, and Santa Rosa — identified discrimination in mortgage lending as a housing problem; and only Oakland mentioned the issue of rental discrimination. The only three jurisdictions to indicate their public housing repair and renovation needs were Oakland, Palo Alto, and Santa Rosa. Santa Rosa and Napa identified a need for affordable farm worker housing. Napa also identified a need for additional elderly housing. San Francisco noted the significant housing needs of recent immigrants, as well as an increased demand for live-work units. Marin County discussed the diverse housing needs of persons with HIV/AIDS and their families. Santa Rosa cited its need to reduce regulatory barriers to the development of affordable housing. Berkeley, alone among Bay Area cities, noted the vulnerability of its housing stock to earthquakes.

Community Development Needs: The Community Development Block Grant (CDBG) program has been in existence since 1974. Since its inception, CDBG funds have been allocated entirely by formula, according to the percent of each city's population which falls below the poverty line and/or lives in a blighted neighborhood. As a result, neither planning nor local needs documentation have ever played a very large role in CDBG program administration. To require such would represent a fundamental policy change in the CDBG program — a change which would require congressional approval as well as substantial additional local planning efforts. Accordingly, HUD requires that consolidated plans include only a minimal discussion of community development needs, organized into four programmatic areas: public improvements, public facilities, public services, and economic development activities.

Of the 17 consolidated plans we reviewed, only six make reference to specific community development needs. The community development section of Oakland's consolidated plan focuses on economic development, and specifically upon the need to increase job opportunities for unemployed, underemployed, and economically disadvantaged Oakland residents. The San Mateo County HOME consortium, by contrast, stresses its public service and facilities needs. Napa, Fairfield, and Santa Rosa provide summary discussions of a full range of community development needs, including mental and physical health care,

jobs and skills training, education and recreation, crime prevention, infrastructure funding, domestic violence, prevention, the needs of persons with AIDS/HIV, child care, and economic development.

Of all Bay Area jurisdictions, San Francisco provides the most detailed documentation of its community development needs. San Francisco's consolidated plan identifies specific neighborhood facilities needs (including childcare centers, senior activity centers, and homeless shelters), public space improvement needs (which include streets, sidewalk, schoolyard, and public housing yard improvement projects), public service needs (including medical services, legal representation, immigrant counseling, and childcare), and economic development needs (including business retention, job-training, industrial expansion, and environmental and energy conservation).

Coordinating Housing and Community Development Needs: Of course there are numerous areas in which housing, homeless, and community development needs overlap: the development and funding of affordable housing, housing renovation, supportive services, and mixed-use development, to name but a few. Although HUD does not require consolidated plans to integrate discussions of community development and housing needs, it clearly hopes that such an integration will be a natural outgrowth of the consolidated plan process. To what extent is this hope met in the first-year consolidated plan submittals we reviewed? In seven of the 17 consolidated plans we reviewed, assessments of housing and community development needs are totally separate. There was a very low level of integration in another four consolidated plans. In only five cases — Sunnyvale, Marin County, San Mateo, Fairfield, and Santa Rosa — did local consolidated planners make some attempt to link community development and housing needs:

- The city of Sunnyvale in its consolidated plan takes a cross-cutting look at the service and affordable housing needs of various resident groups, including the low-income elderly, the homeless, those at risk of becoming homeless, and those with substance abuse and/or mental health problems. Sunnyvale's consolidated plan goes beyond needs identification to propose coordinated policies and strategies in three areas: (i) housing combined with substance abuse treatment and counseling programs; (ii) housing combined with job-training and placement, and child-care programs; and (iii) congregate care facilities which provide food and medical services to special needs populations.
- A major need identified in Fairfield's consolidated plan is to match the production of affordable housing and affordable housing rent levels to job development and wage levels. The Fairfield plan also identifies the importance of providing various youth and senior services in conjunction with the development of affordable housing.
- Integrating supportive services and affordable housing is also a major theme of the city of San Mateo's Consolidated Plan.

Establishing Priorities: There is an inherent tension when writing a plan between trying to be comprehensive and trying to be strategic. Comprehensive plans are all-inclusive. Problems are understood by identifying the linkages between issue areas, and then by coordinating programs and resources across areas. Strategic plans recognize that resources are limited, and that making efficient uses of resources requires some level of problem prioritization. Consolidated plans try to have it both ways.

As we shall see, the Strategic and Action Plan sections require communities to list how they plan to use federal resources. Given that resources are limited, making such lists requires either an implicit or explicit prioritization. No such prioritization is intended for the Needs Assessment section. Needs are to be identified and evaluated independently, without prioritization. The magnitude of lead paint hazards, for example, is not to be evaluated in light of the number of households at risk of becoming homeless, or with respect to inadequate social service provision. *Because they are not required to do so, none of the 17 consolidated plans we read make any attempt to prioritize housing or community development needs.* As we note below, this lack of prioritization makes it more difficult to develop Strategic Plans.

The Missing Computer Connection: None of the Bay Area planners we spoke with who prepared consolidated plans made use of HUD-provided analytical software, maps, and census data.¹⁰ Many local housing planners, particularly those in small cities, lacked the necessary computer literacy. Even those who were generally computer-literate lacked an everyday working knowledge of the mapping software provided by HUD. More to the point, given time, budget, and staffing limitations, concerns that some 1990 census data would already be obsolete, the fact that computer-based analysis was not required, and the one-time nature of undertaking a needs assessment, many planners (and their supervisors) considered the time it would take to learn to use the software poorly spent. Finally, some planners reported that their offices lacked sufficiently powerful computers to run the mapping software.

Overall Readability: The Needs Assessment section establishes the direction and tone of the entire consolidated plan. A well-organized and well-documented Needs Assessment helps make the case for particular programs and activities; a superficial, poorly organized, or unreadable Needs Assessment detracts from that case. Only one of the consolidated plans we reviewed included a Needs Assessment that was easily understandable to a well-educated layperson. Most included appropriate information and analysis, but were poorly organized, or were targeted solely toward HUD. A few were unreadable or completely superficial.

Participation and Consultation

One of HUD's primary goals for the consolidated planning process is to broaden community participation in the plan-making process. Broadening has two meanings in this context. The first is to expand citizen and layperson participation in the identification of needs, the articulation of strategies, and the choice of action programs. The second and perhaps more significant meaning is to involve the fullest possible range of governmental agencies, local governments and housing-related service providers¹¹ in framing comprehensive strategies, identifying funding sources, and developing workable action plans. Promoting the involvement of this second set of agencies, governments, and service providers is termed consultation. Exhibit 2 summarizes the range of citizen participation and consultation efforts undertaken in the preparation of Bay Area consolidated plans.

Exhibit 2: 1995 Bay Area Consolidated Plans: Citizen Participation and Consultation Efforts

City or County	Lead Agency	Citizen Participation Efforts				Consultation Efforts									
		Public Hearings by Legislative Body	Public Hearings by Staff or Advisory Body	Citizen Outreach Effort?	Plan Workshops Conducted?	Other	Other Housing & Development Departments	Public Housing Authority	City/County Social, Health, & Public Service Providers	Non-profit Housing Developers	Homeless Service Providers	Other Social Service Providers	Neighboring Jurisdictions	Housing/Homeless/Service Consortia	Agencies/Departments/Organizations Consulted
Alameda County HOME Consortium	Alameda County Dept. of Housing and Comm. Develop.		x	No	No		x	x	x	x	x	x	x	x	Staff meetings with 160+ housing and service providers
Berkeley	Community Development Dept.	x	x	No	No		x	x	x	x	x	x	x	x	
Fairfield	Community Services Dept.		x	No	No		x	x	x	x	x	x	x	x	
Gilroy	Housing & Community Develop. Coordinator	x	x	Establishment of Citizens Advisory Committee			x	x	x	x	x	x	x	x	
Marin County (includes all cities)	Marin County Community Development Agency		x	Yes	Yes	CP includes Citizen Participation Plan	x	x	x	x	x	x	x	x	Environmental Sciences Division, State Dept of Health Services
Mountain View	Community Development Dept.	x	x	No	No		x	x	x	x	x	x	x	x	Regional HUD CPD staff
City of Napa	Departments of Housing, Planning, and Community Resources	x	x	(through Napa Housing Alliance)			x	x	x	(through consortium)	x	x	x	x	Board of Realtors
Oakland	Office of Housing and Neighborhood Development	x	x	No	No	Citizen workshops conducted as part of Empowerment Zone application	x	x	x	x	x	x	x	x	Utilized ongoing consultation process.
Petaluma	Housing and Block Grant Div. of City Managers Office		x	No	No		x	x	x	x	x	x	x	x	Regional HUD CPD staff
Palo Alto	Dept. of Planning & Community Development		x	No	No		x	x	x	x	x	x	x	x	
Redwood City				Participation process not discussed in Draft CP.											
City of San Mateo	Dept. of Hsing. & Economic Dev.		x	No	Yes		x	x	x	x	x	x	x	x	Homeowner and community groups
San Mateo County HOME Consortium			x												
San Francisco	Mayor's Office of Housing		x												
Santa Clara County (includes seven cities)	Santa Clara County Housing & Comm. Development Staff		x	No	Yes	CP includes Citizen Participation Plan	x	x	x	x	x	x	x	x	
Santa Rosa	Department of Housing and Redevelopment	x		No	Yes		x	x	x	x	x	x	x	x	CDBG Citizens Commitee
Sunnyvale	Dept of Community Develop.	x	x	No	No		x	x	x	x	x	x	x	x	Regional HUD CPD Staff

Citizen Participation: As part of the consolidated planning process, HUD requires that jurisdictions prepare citizen participation plans. (HUD does not, however, require that the citizen participation plan be included in the consolidated plan.) Consolidated plan jurisdictions must meet three participation requirements in addition to preparing a plan. They must: (i) hold at least two public hearings each year; (ii) provide for a 30-day comment period on draft plans; and (iii) respond to comments in written form within 15 days of their receipt, where possible.

Only two of the Bay Area consolidated plans we reviewed included citizen participation plans. As required by HUD, every Bay Area jurisdiction held at least one public hearing prior to adopting its consolidated plan. Many jurisdictions held multiple hearings. Berkeley's Housing Advisory Commission, for example, held three public hearings on that city's draft consolidated plan. As in Berkeley, most public hearings were held before appointed commissions, advisory bodies, or staff. Only seven of the 17 consolidated plans we reviewed were the subject of public hearings before a legislative body such as a city council or county board of supervisors.

Local citizen participation efforts rarely went beyond notification and public hearings. Only two of the 17 Bay Area communities whose consolidated plans we reviewed, Gilroy and Marin County, undertook efforts beyond notification to increase citizen involvement. Three other communities — San Mateo, Santa Clara County, and Santa Rosa — conducted citizen workshops or focus groups to identify needs, strategies and action plan items. The city of Napa contracted with the non-profit Napa County Housing Alliance (a consortium of 14 non-profit housing agencies and service providers) to coordinate its citizen outreach and participation efforts. Citizen input into Oakland's consolidated plan was provided by the city's seven existing community development district boards and by public meetings held to prepare Oakland's Empowerment Zone application. Ironically, the city that apparently did the least to solicit citizen involvement in its consolidated plan was San Francisco; the plan's authors cited HUD's tight deadline for plan submission as precluding a comprehensive citizen involvement effort.

All in all, most Bay Area cities worked to meet the letter of HUD's participation requirement, but rarely its spirit. A number of reasons for this emerged from sidebar conversations with Bay Area housing planners. In some cities (e.g., Berkeley, Oakland, and Sunnyvale), the easiest and most productive approach was simply to graft the citizen participation requirement of the consolidated plan onto the work of ongoing citizen housing and/or community development commissions. In other places, planners indicated that public meeting held exclusively to discuss the preparation of planning documents tended to be either poorly attended, or else dominated by specialized interest groups. Still other planners noted that the limited time available for plan preparation necessarily displaced citizen participation from the beginning of the planning process — where citizens might provide ideas and input — toward the end of the process, where citizens could comment on draft documents.

Consultation: New to the consolidated plan process is a requirement that jurisdictions consult internally and externally with public, private, and non-profit housing agencies, and particularly with

health and welfare agencies. Most of the 17 consolidated plans we reviewed included a list of groups and agencies that had been consulted in their preparation. These typically included other city agencies working in the areas of housing, planning, or community development; non-profit housing developers and providers; and, as directed by HUD guidelines, health and social service agencies (Exhibit 2). Less widely mentioned were consultations with neighboring local governments, with private sector interests, or with redevelopment officials. Several jurisdictions consulted with the regional (San Francisco) HUD office. A few lead agencies consulted with environmental departments or agencies regarding the incidence and severity of lead paint hazards. Private sector organizations were generally omitted from local consultations. Santa Rosa planners consulted with several (unnamed) representatives of the building industry. The only jurisdiction to include a local board of realtors in their consultations was Napa.

Consulted does not necessarily mean involved, and nowhere was this more true than in the case of local public housing authorities. Most jurisdictions that have public housing authorities consulted them. Rarely, however, were the needs of public housing tenants mentioned in the Needs Assessment sections of Bay Area consolidated plans. None of the Strategic Plans (see below) made reference to public housing issues. Likewise, none of the projects or programs listed in local Action Plans were targeted toward public housing.¹² In short, the fact that an organization is consulted in the process of preparing a consolidated plan does not insure that its legitimate needs or issues will be addressed.

The overall effect of HUD's consultation requirement, at least in the Bay Area, has been to give social service, homelessness, and supportive housing issues a greater measure of attention than they otherwise would have received. As one Bay Area housing planner remarked, "Even if it doesn't do anything else, the consolidated plan (requirement) has opened up local housing planning to social service agencies that had previously — and perhaps mistakenly — been left out of the mix. In that sense, I think it's probably positive." To what extent has the greater attention given to social service issues displaced the concerns of production-oriented affordable housing providers? In the short term, any such displacement has been minimal. As we note below, the strategies and action plans adopted by most Bay Area cities still stress reducing high rent burdens and encouraging the production of new affordable housing units. In the longer-term, however, to the extent that local housing planners and social service agencies work more closely together — and are rewarded by HUD for doing so — the effect may be much greater.

Strategic Plans

The heart of every consolidated plan is supposed to be the strategies section, more formally known as the "Housing and Community Development Strategic Plan." The Strategic Plan is intended to be a 3- to 5-year planning document that brings together identified needs and available resources. HUD guidelines stipulate that strategic plans include three elements: (i) a *Resources* element, indicating the public and private funding resources likely to be available to carry out the plan; (ii) an *Objectives* element describing housing and community development objectives, actions, programs, and projects

intended to be completed; and (iii) a *Coordination* element, describing coordinating mechanisms and agencies. Consistent with HUD's desire to minimize additional paperwork, the objectives element (with some additions) is meant to be adapted directly from the CHAS. Inclusion of a resources element reflects HUD's desire that whatever strategies or programs are adopted be realistic. Requiring a coordination element is HUD's way of encouraging inter-jurisdictional cooperation where appropriate, and inter-departmental cooperation between housing and community development departments.

By these standards, all of the Bay Area Strategic Plans we reviewed are at least adequate. All identify current and projected resources, list current housing and related needs, identify strategies or programs for meeting those needs, and identify key implementing agencies or departments.

The Objectives Element: Of the three required Strategic Plan elements, the objectives element is clearly the most important. It must demonstrate how the various strategic plan objectives and proposed actions follow from the prior identification of needs. HUD guidelines suggest that the objective element be divided into five priority needs areas and four non-priority areas:

Priority Areas

- priority housing needs
- priority homeless needs
- priority {non-housing} community development needs
- other special needs populations
- an anti-poverty strategy

Non-Priority Areas

- a public housing strategy
- programs for ameliorating lead-based paint
- strategies for reducing barriers to meeting affordable housing objectives
- an identification of key institutional gaps

Priority needs are to be further classified as "high," "medium," or "low" priority using a standardized HUD worksheet (included as Appendix B).

Among Bay Area communities, the attention given each of these priority needs areas varies widely. Almost all Bay Area consolidated plans include detailed discussions of priority housing and homeless needs; a much smaller number break out the housing requirements of special-needs populations. Much less detailed are presentations of non-housing community development needs. Indeed, in discussing community development needs and strategies, most Bay Area communities begin and end with general discussions of current CDBG-funded activities. Three communities — Gilroy, Redwood City, and Sunnyvale — omit any discussion of community development needs and strategies. Except for lead-based paint, the other HUD-identified needs areas are given short shrift.

In specifying guidelines for developing strategic plans, it is clearly HUD's intention that communities pursue a model linking needs (as identified in the Needs Assessment section) to multi-year goals and strategies (as specified in the Strategic Plan section) to specific programs, projects or plans (as listed in the Action Plan section, see below). As evidenced in their consolidated plans, some Bay Area cities are better at making (or at least indicating) these linkages than others. For example:

- Five Bay Area communities (Fairfield, Mountain View, Napa, Redwood City, and San Francisco) take a "needs-based" approach to the development of housing strategies. That is, goals or strategies are selected precisely because they respond to identified housing needs. Mountain View, Napa, and Redwood City also link their housing goals and strategies forward to particular programs and activities.
- Five other Bay Area communities (Berkeley, Petaluma, Palo Alto, Santa Clara County, and Sunnyvale) take a more project or programmatic approach to housing planning. These communities typically work backwards from established or preferred programs and projects. Housing initiatives in these communities are weakly linked to identified needs, and housing strategies tend to be vague. Although such an approach doesn't automatically mitigate against developing successful housing programs and projects, it does make it more difficult to measure success.
- The remaining eight consolidated plans we reviewed fall between these two extremes. They include a mixture of housing goals and strategies, some of which are tightly linked to identified needs, others of which are fairly independent of measured needs.

Priority Housing and Homeless Needs: Steered by HUD guidelines, all of the strategic plans we reviewed focused on issues of housing and homelessness. Most focused on five common issues or strategic areas (Exhibit 3):

1. Preserving existing supplies of affordable rental housing;
2. Developing additional supplies of affordable rental housing, primarily for low- and very-low-income families, for the elderly, or for those with special needs.
3. Expanding homeownership opportunities, particularly for low- and moderate-income residents.
4. Deterring homelessness where possible, primarily by providing tenant-based rental assistance.
5. Improving the quantity and quality of housing and related service for those currently homeless, usually through a "continuum of care" model.

Two other broad issue areas, rehabilitating substandard units and housing maintenance, and deterring housing discrimination, were also addressed in a significant number of strategic plans.

These strategy choices reflect locally identified needs as well as top-down federal policy initiatives. The emphasis given to strategies for improving housing affordability follows from the high cost of Bay Area housing, from the ease of documenting such needs, from the success many Bay Area communities have had at promoting affordable housing development, and from the direct CHAS lineage of most consolidated plans. Somewhat less predictable are the specific affordability strategies advanced by particular communities.

Oakland and Berkeley, for example, two central cities with long policy histories of promoting rental housing affordability, give equal weight in their strategic plans to improving homeownership affordability.¹³ Conversely, Fairfield, Gilroy, Napa, and San Mateo, four suburban communities dominated by homeowners, give precedence to strategies aimed at improving rental affordability. With respect to the question of how best to improve rental affordability — whether through tenant-oriented rent assistance or by encouraging the production of new supply — most cities come down squarely in the middle, coupling the use of vouchers (and similar tenant assistance programs) to maintain affordability for existing renters with the production of new affordable units (primarily by non-profits) to meet additional

Exhibit 3: 1995 Bay Area Consolidated Plans: Comparisons of Strategies

City or County	Housing and Homeless Goals, Objectives, or Strategies													Other needs areas included:
	Housing goals & objectives linked backward to identified needs?	Housing goals & objectives linked forward to strategies	Preserve existing affordable rental housing?	Develop additional affordable rental housing?	Encourage first-time, low- & moderate-income homeownership	Rent assistance for low-income renters	Provide emergency homeless shelters	Provide coordinated housing & social services to homeless	Rehabilitate substandard units	Combat housing discrimination	Separate analysis of priority homeless needs?	Separate analysis of special needs populations?	Include detailed discussion of priority community development needs?	
Alameda County HOME Consortium	Yes	Yes, although varies by city	x	x	x	x	x	x	x	x	Somewhat	varies by city	Generally no, but varies by community	
Berkeley	Generally not	Generally not	x		x	x	x				Yes	No	Yes	
Fairfield	Yes	Yes	x	x	x	x	x	x	x		Yes	No	No	Neighborhood preservation programs
Gilroy	Not clear from CP	Somewhat	x	x	x	x	x	x	x	x	No	No	No	CDBG funds for Non-profits
Marin County (includes all cities)	varies by goal area	No	x	x	x	x	x	x	x		Yes	No	Somewhat	
Mountain View	Yes	Yes	x	x	x	x	x	x	x		Yes	Yes	Somewhat	Promote residential energy conservation.
City of Napa	Yes	Yes	x	x	x	x	x	x	x		No	No	Somewhat	
Oakland	varies by need area	varies by need area	x	x	x	x	x	x	x	x	integrated w/housing plan		Yes	
Petaluma	No	No	x	x							No	No	No	
Palo Alto	No	No	x	x	x	x	x				Somewhat	Somewhat	No	
Redwood City	Yes	Yes	x	x	x	x	x	x	x		No	No	Somewhat	
City of San Mateo	Somewhat	Somewhat	x	x	x	x	x	x	x		Not really	Not really	Yes	Regulatory relief
San Francisco	Yes	Generally yes	x	x	x	x	x	x	x		integrated w/housing plan		No	
Santa Clara County (includes seven cities)	No	No	x	x	x	x	x	x	x	x	Not really	No	No	Regulatory relief to promote affordable housing
Santa Rosa	Generally yes	varies by goal	x	x	x	x	x	x	x		Somewhat	No	No	Remove regulatory barriers to affordable housing
Sunnyvale	Somewhat	varies by goal	x	x	x	x	x	x	x		Not really	No	No	

affordable rental housing demands. Such a combination is tailor-made to employing all available HUD affordable housing funds, including Section 8, CDBG, HOME, and the low-income housing tax credit.

In a few cities (e.g., San Francisco), the emphasis given to issues of homelessness and supportive services follows from a clear analysis of homeless and supportive service needs. More likely, one suspects, this emphasis reflects the importance HUD itself attaches to these issues (as articulated in its consolidated plan guidelines), as well as to the availability of specific funding sources.

Still, despite pressures to conform to specific HUD documentation guidelines (as well as to maximize future funding potential), there is a substantial degree of individuality and innovation within most Bay Area consolidated plans. The Alameda County HOME Consortium, and the cities of Redwood City, Santa Clara, Mountain View, and Gilroy, for example, all identify fighting housing discrimination as a priority housing need. Gilroy also identifies abating lead-based paint as a priority housing need. Mountain View's strategic plan promotes the use of energy-saving devices to reduce housing occupancy costs. And Redwood City's strategic plan draws an explicit link between economic development, job creation, and improved housing affordability. Finally, as noted above, many cities include expanded homeownership strategies.

Community Development and Anti-Poverty Strategies: As noted above, local planning requirements for CDBG-funded community development programs and activities have always been fairly modest. The consolidated plan strategies section attempts to make such requirements more rigorous, primarily by encouraging communities to link their identification of community development needs with the development of appropriate goals or strategies and the funding of particular programs or projects — the same approach used for housing. The key word here is encourage, not require. In fact, HUD requires communities to merely identify priority community development needs. It neither requires them to prioritize those needs, develop strategies for meeting those needs, nor adopt specific programs. What emerges as a result is a series of vague and unique-to-each-community collections of infrastructure, economic development, and public and social service goals, strategies, policies, projects, and programs — most of which currently receive CDBG funds, and most of which have little relation to housing issues or needs. In reporting their priority community development needs, some Bay Area communities (e.g., Redwood City, Napa, Sunnyvale, Santa Rosa) list existing programs and projects. Others (Marin County and the Alameda County HOME Consortium, for example) focus on trying to meet specific public and social service needs. Two communities, Oakland and Berkeley, stand out for their level of detail and discussion of community development issues and initiatives; they are less noteworthy, however, in linking needs, strategies, and programs.

Institutional Structure and Coordination Gaps: The Coordination Element, the final part of the Strategic Plan, is new to the consolidated plan, and was not required in previous planning documents. In developing the Coordination Element, jurisdictions are to describe how they plan to coordinate various resources — including funding, departments, agencies, people, organizations, and existing facilities

and programs — to achieve the goals or implement the strategies set forth in the Objectives element. Two sections of the Coordination Element are particularly important: (i) a description of the jurisdiction's housing and community development institutional structure; and (ii) descriptions of coordination difficulties or "gaps." A third required section, an identification of barriers to the production of affordable housing, is pulled right out of the CHAS requirement.

Most Bay Area jurisdictions gave short shrift to their Coordination Elements. A few omitted them altogether. In reporting their institutional structure, most Bay Area communities listed their existing housing and/or community development agencies, described their functions, and noted their roles in city or county government. About half of the Coordination Elements listed additional city or county agencies with housing, social service, economic development, or community development responsibilities. A few communities also included non-profit housing developers and social service providers as part of their institutional structure. Only eight of the Coordination Elements we reviewed identified which departments or agencies had particular program or project implementation responsibilities (Exhibit 4). In addition to being brief, most Coordination Elements were disengaged from the strategies, goals, objectives, or activities articulated in their preceding and respective Objectives Elements; only three communities — Redwood City, Mountain View, Napa — made any attempt to link particular departments or agencies with particular strategies.

About half of the consolidated plans we reviewed included a minimal discussion of agency and/or resource coordination; the other half omitted that section altogether. About a quarter of Bay Area consolidated plans identified particular coordination difficulties or gaps. Lack of funds was the most commonly identified gap, followed by the problems of inter-departmental and inter-agency coordination. A few jurisdictions commented on the apparent lack of coordination between different public and non-profit service providers, and the difficulties of getting service providers with different clients and missions to cooperate. None of the consolidated plans we reviewed included ideas for solving these problems.

Coordinating Housing, Homeless, and Community Development Planning: Particularly in their Needs Assessment sections, most of the consolidated plans we reviewed noted clear overlaps between the problems associated with homelessness, and the difficulties faced by low-income renters. These overlaps often seemed to get lost, however, when it came to allocating funds, assigning agency responsibilities, or proposing specific programs. Only two Bay Area communities, Berkeley and Gilroy, proposed coordinated housing and homeless initiatives. More commonly, Bay Area communities assigned the responsibility for undertaking housing and homeless initiatives to the same agency or department, but failed to note how such initiatives would be coordinated. Two communities, Oakland and Santa Rosa, assigned the function of coordinating homeless and affordable housing initiatives to local non-profits. Jurisdictions in Santa Clara County assigned the coordination function to the Santa Clara County Homeless Collaborative, but declined to indicate how the collaborative would be funded, or

Exhibit 4: 1995 Bay Area Consolidated Plans: Coordination and Implementation Issues

City or County	Implementing Agencies or Structure Clearly Identified?	Coordination Gaps, Issues or Agency Roles Clearly Identified?	Level of Agency & Resource Coordination Between	
			Housing and Homeless Programs.	Housing and Community Dev.
Alameda County HOME Consortium	Varies by city	Varies by city	Mostly high	Generally low
Berkeley	Yes	No	High	Moderate
Fairfield	Yes	No	Low	Low
Gilroy	Somewhat	Yes	High	Low
Marin County	Yes	No	Moderate	Varies by city
Mountain View	Yes	Yes	Moderate	Minimal
City of Napa	Varies by program area	Yes	Varies by program area	Varies by program area
Oakland	Yes	Yes	Primarily through non-profits	Low
Petaluma	Yes	Somewhat	Not clear	Not clear
Palo Alto	Somewhat	Yes	Through county-wide collaborative	Not clear
Redwood City	Somewhat	Yes	Moderate	No
San Francisco	Yes	No	Moderate	Moderate
City of San Mateo	Somewhat	No	Low	Low
San Mateo County HOME Consortium				
Santa Clara County (includes 7 cities)	Yes	Somewhat	through County Collaborative	through "Urban County" staff
Santa Rosa	Yes, but only in a cursory fashion	Yes, but only in a cursory fashion	through non-profits	Not noted
Sunnyvale	Yes, but only in a cursory fashion	Not really	Not clear	Not clear

what its specific responsibilities were to be. Three jurisdictions — Fairfield, Petaluma, and Sunnyvale — avoided issues of program coordination altogether.

The same two communities, Berkeley and San Francisco, that proposed coordinated housing and homeless strategies also tried to relate their housing and community development plans. Every other Bay Area community either: (i) avoided altogether the issue of coordinated housing and community development planning; or, (ii) declined to list their community development strategies — thereby rendering moot the issue of coordination.

Action Plans

The consolidated plan Action Plan is, to use a popular expression, "where the rubber meets the road." The Action Plan is a one-year list of the activities the jurisdiction proposes to undertake to address the priority needs identified in the Strategic Plan; an accompanying narrative is suggested but not required. Activities are to be itemized, and name the implementing department or sponsor, specific requests for funding under the CDBG, HOME, ESG, or HOPWA programs, and a determination as to whether the proposed activity meets one of four HUD goals (prevention of homelessness, homeless assistance, assistance to those with HIV or AIDS, and assistance to low-income persons). These listings are to be included as Consolidated Plan Table 3 of every consolidated plan. HUD suggests, but again does not require, that jurisdictions discuss how their various Action Plan items link back to their Strategic Plan. HUD also suggests, but does not require, that jurisdictions identify non-HUD sources of funding for each Action Plan item.

About a third of Bay Area 1995-96 Action Plans consist solely of a HUD-required list of proposed projects and programs (Exhibit 5). The project list is augmented by a brief list in another third of the Action Plans. The final third of plans includes more detailed discussions organizing the proposed projects and programs by strategy or theme area. Most Action Plan lists do not distinguish housing or homeless-oriented projects from community development projects. Fairfield's action plan lists only community development activities. At the opposite extreme, San Francisco's action plan lists only housing-related projects.

The extent to which Action Plans are tied back to Needs Assessments and Strategic Plans varies by jurisdiction. Berkeley, Gilroy, Mountain View, and Napa each discuss how individual action items relate to particular needs, goal areas, or strategies. Redwood City successfully carries this link one step further by including each action activity in its strategic plan under the appropriate strategy. At the opposite extreme, Petaluma, San Mateo, Santa Rosa, and Sunnyvale list proposed action items without any reference to housing or community development needs. Fairfield, Oakland, Palo Alto, San Francisco, and Santa Clara County lie between these extremes; their action items are loosely tied to areas of need or to general strategies. In keeping with HUD requirements, most Bay Area communities note which of four HUD goals are addressed by particular action items.

Exhibit 5: 1995 Bay Area Consolidated Plans: Action Plan Format and Features

<u>City or County</u>	Action Plan format	Does Action Plan refer back to needs or strategies?	Does Action Plan refer to HUD goals	Coordinated use of CDBG, HOME, HOPWA, and ESG funds?
Alameda County HOME Consortium	Varies by city; mostly project lists	Varies by city; mostly no	Varies by city; mostly yes	Varies by city; mostly no
Berkeley	Detailed narrative	Yes	Not really	Somewhat
Fairfield	limited to CDBG projects	Somewhat	Yes	Minimal
Gilroy	Brief narrative	Yes	No	Unclear
Marin County	Project & program listing	not clear from CP document	No	Minimal
Mountain View	Narrative, listing 5-year goals and 1-year objectives	Yes	Yes	Minimal
City of Napa	Partly combined with Strategic Plan	Yes	Yes	Minimal
Oakland	Narrative tying goals & activities	Somewhat	Yes	Yes
Petauma	Project & program listing	No	Yes	No
Palo Alto	Narrative matching programs and funds	Somewhat	Yes	Moderate
Redwood City	List of projects matched to funding sources.	Action items included in Strategic Plan.	Yes	No
San Francisco	Housing only	Somewhat	Somewhat	Yes
City of San Mateo	Narrative & project list	Slightly	Somewhat	Minimal
San Mateo County HOME Consortium				
Santa Clara County (includes 7 cities)	Brief narrative	Somewhat	Yes	No
Santa Rosa	Project & program listing	No	Yes	Minimal
Sunnyvale	Project & program listing	No	Yes	Minimal

One of HUD's goals for consolidated planning is for communities to coordinate their use of different federal funding sources. Accordingly, for each activity listed in the Action Plan, jurisdictions are supposed to indicate the specific amounts of CDBG, HOME, ESG, or HOPWA funds being requested. Some activities are eligible for only one type of funding. Infrastructure improvements, for example, can only be funded out of CDBG funds. For most projects, however, funds can be requested from multiple funding sources. In fact, only two Bay Area jurisdictions, Oakland and San Francisco, requested funding from multiple sources for a significant share of their action items. Two more communities, Berkeley and Palo Alto, requested funding from multiple sources for a few action items. The remainder of Bay Area jurisdictions relied on just one funding source per action item. Why are Bay Area communities so reluctant to rely on mixed funding sources? We offer a number of speculations:

- Housing planners in San Francisco, Oakland, Berkeley, and Palo Alto are more experienced than planners in other communities at putting together complicated projects that depend on multiple funding sources.
- Because the HOME, ESG, and HOPWA programs are all still relatively new, local planners do not yet know how to combine funding programs.
- Local housing planners might be reluctant to put together multi-source funding packages, given persistent worries about the future political stability of particular programs.
- Housing and community development funds are inherently fungible. Given federal reporting and certification requirements, it is often much easier to creatively mix internal funds than external ones.

IV. CONCLUSIONS

How Good are First-Year Bay Area Consolidated Plans?

Although a few are good, as a group, the 17 consolidated plans we reviewed must be judged as merely adequate. All but one adequately document existing housing needs, summarize available resources, list programmatic funding requirements, and generally respond to HUD's informational requirements. And as noted below, none meet HUD's goal of integrating housing and community development initiatives.

What constitutes a good consolidated plan? Putting aside for the moment the issue of coordination between housing and community development, a good consolidated plan should

1. Include a comprehensive, up-to-date, and objective assessment of local housing and community development needs. The magnitude of particular needs should be evident, as should their incidence with respect to income, race, and household structure.
2. Include multi-year goals — preferably objectives and strategies for meeting identified needs.
3. Include an action plan of specific policies, programs, or projects intended to achieve the identified goals.
4. Identify the internal and external funding resources required to implement the proposed action plan as well as outline an effective agency or institutional implementation structure.

Exhibit 6 includes our summary evaluation of how well the 17 consolidated plans we reviewed met these four criteria. Most of the 17 consolidated plans we reviewed included adequate assessments of housing and homeless needs. Some were better than others: Fairfield, Mountain View, Oakland, Redwood City, San Francisco, and Santa Rosa all included comprehensive, concise, and numerical estimates of housing need — usually broken down by income and household type. None of the consolidated plans we reviewed included an even remotely adequate assessment of community development needs.

Only a few of the consolidated plans we reviewed put forth goals or strategies based on their prior identification of needs. Fairfield, Mountain View, Napa, and Redwood City were the best of the lot in this respect; Berkeley, Petaluma, Palo Alto, and Santa Clara were the worst. There was also surprising lack of congruence between goals and strategies (as identified in each Strategic Plan) and proposed programs and projects (as identified in each Action Plan). Indeed, most action plans consisted solely of a list of proposed projects and their funding needs. A few jurisdictions — Berkeley, Fairfield, Mountain View, Napa, and Santa Clara County — at least attempted to match proposed actions to goals or needs. Finally, almost all of the consolidated plans we reviewed failed to identify which resource needs were most critical (in light of their proposed strategies); which agencies, departments, or organizations would have implementing responsibility for which programs; and how the different implementing agencies would coordinate their efforts. The only jurisdictions that addressed these critical implementation issues in anything more than a cursory fashion were Berkeley, Mountain View, Napa, and San Francisco.

How Well Did First-Year Bay Area Consolidated Plans Meet HUD Goals?

Exhibit 6 presents our summary evaluation of the overall quality of Bay Area consolidated plans; Exhibit 7 includes our summary rating of how well each Bay Area consolidated plan met HUD's five consolidated planning goals.

Goal 1: Promote closer programmatic and institutional coordination between local housing and community development planning efforts. In many cities, housing programs and community development activities are separately planned, developed, implemented and administered. By requiring cities to jointly identify housing and community development needs, develop strategies for meeting those needs, and then describe how proposed projects matched strategies, HUD hoped to begin to force communities to tear down this programmatic and institutional wall. Is this hope being met?

None of the consolidated plans we reviewed included a single integrated housing and community development needs assessment. (This was probably because HUD did not explicitly require them.) None analyzed community development needs with the specificity or detail that they analyzed housing needs. (Again, HUD did not explicitly require such specificity, and no prior documentation comparable to the CHAS was available.) This wall between housing and community development extends into the area of strategies as well. *None of the consolidated plans we reviewed included strategies which combined housing and community development elements.* As noted above, almost all Bay Area communities directly adapted

Exhibit 6: 1995 Bay Area Consolidated Plans: Summary of Plan Quality

City or County	How Good are Bay Area Consolidated Plans?			
	Comprehensiveness and quality of housing needs assessment	Goals & strategies linked to identified housing needs?	Action plan items linked to goals and strategies	Resources and implementing structure consistent with goals, strategies, and Action Plan?
Alameda County HOME Consortium	Fair	Generally yes	Varies by city	Varies by city
Berkeley	Poor	Generally no	Yes	Yes
Fairfield	Good	Yes	Yes	Not really
Gilroy	Fair to Good	Not clear	Somewhat	Not really
Marin County	Fair	Somewhat	Not clear	Somewhat
Mountain View	Good	Yes	Yes	Yes
City of Napa	Fair	Yes	Yes	Yes
Oakland	Good	Somewhat	Generally yes	Somewhat
Petaluma	Poor	No	Generally yes	Not clear
Palo Alto	Good	No	Somewhat	Not clear
Redwood City	Good	Yes	Not clear	Not clear
San Francisco	Good	Generally yes	No	Yes
City of San Mateo	Good	Somewhat	Somewhat	Not clear
San Mateo County HOME Consortium				
Santa Clara County	Fair	No	Yes	Not clear
Santa Rosa	Good	Generally yes	No	Generally yes
Sunnyvale	Fair	Somewhat	Not really	Not clear

Exhibit 7: 1995 Bay Area Consolidated Plans: Achievement of HUD Objectives

City or County	How Well do Bay Area Consolidated Plans Meet HUD Goals?				
	Closer programmatic integration of housing and community development activities?	Promote more efficient use of federal housing and community development funds?	Broaden community and interest group participation?	Streamlined Housing/CD Paperwork	Document Readability
Alameda County HOME Consortium	Varies by city	No	Not clear	Yes	Fair
Berkeley	Not Clear	Somewhat	Somewhat	Somewhat	Fair
Fairfield	No	Somewhat	Somewhat	Somewhat	Good
Gilroy	No	No	Yes	Yes	Fair
Marin County	Not clear	Somewhat	Somewhat	Yes	Fair
Mountain View	No	Somewhat	Yes	Somewhat	Good
City of Napa	No	Yes	Yes	Yes	Fair
Oakland	No	Somewhat	Somewhat	Somewhat	Fair
Petaluma	No	Not clear	No	Yes	Poor
Palo Alto	No	Somewhat	Slightly	Yes	Fair
Redwood City	Not clear	Not clear	No	Not really	Sections vary
San Francisco	Somewhat	Not clear	Not clear	Yes	Fair
City of San Mateo	Fair	Somewhat	Somewhat	Yes	Good
San Mateo County HOME Consortium	Not clear		Not clear	Not really	Poor
Santa Clara County	Not clear	Not clear from document	No	Yes	Fair
Santa Rosa	Not clear	Somewhat	No	Yes	Good
Sunnyvale	Somewhat	Not clear	Somewhat	Somewhat	Fair

the housing strategies developed in their CHASes. Accordingly, while all of the jurisdictions surveyed included detailed housing strategies in the consolidated plans, only a few (Berkeley, Oakland, Napa, and Mountain View) included detailed community development strategies.

Most of the plans reviewed achieved a somewhat greater level of integration between housing and community development in their Action Plans. In listing proposed projects, eight jurisdictions (Berkeley, Redwood City, Sunnyvale, Fairfield, Mountain View, San Mateo, Marin County, and Santa Rosa) noted and commented on the coordinated use of housing and community development programs or fund sources. *Only one of the reviewed plans, however (San Mateo County HOME Consortium), even addressed the issue of institutional or cross-department coordination.*

Goal 2: Improve programmatic coordination to promote the more efficient use of federal funds for housing projects. As noted above, the various consolidated plans we reviewed paid little attention to coordination issues in their needs assessment and strategy sections. There was a high degree of implicit coordination in many action plan items, however, as jurisdictions noted their dependence on multiple programmatic sources to fill funding gaps, particularly in the construction of affordable units.

Particularly among the urban municipalities, the coordinated use of different funding programs for proposed housing projects for AIDS/HIV patients, for special needs populations, and for the homeless comes through strongly. None of the plans we reviewed included programs aimed at public housing tenants. A few addressed the need to promote moderate-income homeownership.

Goal 3: Broaden community and interest group participation in the plan-making process. A major goal of consolidated planning is to broaden the plan-making process to include community groups, housing advocates, program beneficiaries, service providers, and related departments. Intent and practice are often two different things, however. Despite strong words regarding the value of a more participatory process, HUD guidelines require that consolidated plan jurisdictions conduct only two public meetings and otherwise respond in writing to solicited public comments. In the interests of simplifying the planning process and reducing documentation, jurisdictions are required to certify only that they have undertaken an adequate public participation process; they are not required to detail the process. It thus becomes very difficult from the documents themselves to evaluate the quality of the participation/consultation process. None of the 17 Bay Area jurisdictions we surveyed undertook an entirely new participation process for the purpose of developing their consolidated plans. *Most, however, did expand consultations with non-profit housing and service providers, with other city agencies, and, in a few cases, with other jurisdictions.* As noted above, the primary impetus for such consultations was generally to find appropriate funding sources for proposed projects and/or services.

Goal 4: Reduce local paperwork/streamlining the local planning process: We start with the goal of reducing paperwork and streamlining the local planning process. Initially this was to be a side benefit of an improved planning process, not its *raison d'etre*. Nonetheless, given the short time-schedule available to produce consolidated plans, it quickly became a major selling point to local jurisdictions as well as to

HUD regional offices. As we shall see, achieving this goal has meant short-changing some others — at least in the first year.

HUD requires that consolidated plans consist of four major and two minor sections: (a) a housing and homeless needs assessment; (b) a housing market analysis; (c) a strategic plan for meeting priority housing and community development needs; (d) a first-year action plan; (e) certifications; and (f) monitoring provisions. The first three of these sections parallel those of the CHAS, and many local housing planners were advised by HUD officials that they could insert their existing CHAS needs assessments and market analysis directly into their draft consolidated plans. Most plan preparers in the San Francisco Bay Area followed this advice. *Of the 17 plans we reviewed, all based their needs assessments and strategies sections directly on existing CHAS documentation.* A number of communities, most notably Berkeley, Mountain View, Oakland, and Fairfield, included substantial additional information and analysis that had not been in their CHASes.

As required by HUD, local consolidated plans must include a number of additional items not generally included in prior CHASes — notably, an analysis of lead-based paint hazards, a detailed analysis of additional special-needs populations, and a review of public housing renovation needs. *Except where prior documentation was available, most of the consolidated plans we reviewed addressed these issues in a cursory fashion.*

To make it easier for communities to identify housing and community development needs, HUD made available free of charge a microcomputer package combining census tract-level statistical summaries with computer mapping capabilities. Although straightforward, the package required considerable technical expertise, training, and computer hardware to use. *Accordingly, none of the 17 communities we surveyed made use of this capability.*

Goal 5: Make plans more accessible to local populations. HUD intends consolidated plans to be easier to read, as well as simpler to prepare. Whereas the client for previous HUD documents, including the CHAS, had typically been the HUD Regional Office, consolidated plans are also to be directed to the interested public. This means they should be as short as possible, illustrated with understandable graphics and maps, and written in everyday English. (This goal has emerged from a review of several early consolidated plans and was not in the original requirements.) *Only about half of the 17 consolidated plans we reviewed include an explanatory narrative; the other half are presented solely to conform to HUD guidelines. None are shorter than the CHASes they supersede, and only one or two would be easily understandable to the layperson.*

Summary: Mixed Results and Mixed Messages

What accounts for the middling quality of Bay Area consolidated plans? Certainly the limited time available for plan preparation and the continuing financial pressures facing Bay Area communities played a major part. More important still have been the mixed messages sent by HUD:

- *Lack of Models*: HUD identified what it considered to be an adequate consolidated planning process, and stipulated the sections and reporting information that consolidated plans were to include, but never indicated — through either guidelines or by example — what would constitute a "good" consolidated plan.
- *Simplicity vs. Comprehensiveness*: Consolidated plans were supposed to be more comprehensive than the documents they replaced at the same time that they were to be shorter, simpler, and easier to prepare. To achieve these dual (and perhaps conflicting) purposes, HUD: (i) allowed and encouraged communities to use their CHAS as the conceptual and substantive backbone of their consolidated plans; (ii) encouraged communities to use a HUD-provided software package to analyze and summarize various needs; and (iii) standardized reporting formats in the form of three data tables. These were all good steps, but, in the absence of criteria or guidance as to what constituted a good consolidated plan, either didn't work or else short-circuited the consolidated planning process. As good a model as the CHAS was for housing planning, it was far less useful as a model of combined housing-community development planning. Similarly, standardized forms are an appropriate plan-reporting format, but they should not be used — as they were in many Bay Area communities — to determine the substance of a plan.
- *Political Uncertainties*: HUD intimated early on that it would use the priorities identified in local consolidated plans to help guide discretionary funding decisions. HUD's subsequent policy document, *Blueprint for HUD Reinvention*, further emphasized the importance of consolidated plans. Despite these positive *administrative* signals, the *policy* signals coming out of Congress (and to a lesser extent, the executive branch) all emphasized the future uncertainty surrounding specific HUD programs and HUD itself. The local response to these national uncertainties was to make consolidated planning a lower priority.

Plans vs. Planning

It is important to remember that good plans are not the same thing as good planning. Communities can write excellent plans and then put them on a shelf unread. Fairfield's consolidated plan, for example, was one of the best in the Bay Area. Yet by its own admission, Fairfield still has a long way to go in meeting the needs it identifies in its plan. Alternately, many communities are able to pursue effective programs and projects in the absence of good plans. San Francisco, Oakland, and Berkeley are examples of cities that have enacted innovative and often effective approaches to addressing housing and homeless problems; yet of these three cities, only Oakland produced a consistently good consolidated plan. Petaluma, a city known for its strong and responsive planning, produced the Bay Area's most superficial consolidated plan. More important to long-term success than a good planning document are an ongoing community commitment to addressing problems, a willingness to adopt ambitious goals, and the discipline to continually measure performance against those goals.

This is not to say that good plans play no role in good planning. Good plans have a number of advantages over bad plans or no plans. Good plans facilitate continuity. Housing and community development decisions are inherently political; without plans they tend to become even more so. Housing and community development policies in Berkeley and San Francisco (two cities which have not emphasized planning), for example, have tended to seesaw back and forth with the outcome of local elections. Plans cannot entirely prevent this from happening, but they can mitigate against it. Good planning also increases opportunities for program and resource coordination. Good planning helps communities identify their needs and prioritize them before they become acute. Finally, good planning encourages strategies to follow from needs, not vice versa, and so tends to reduce *ad hocism*.

Improving Consolidated Planning

The Bay Area provides a useful, although by no means representative, lens through which to study how well HUD's consolidated planning requirement is working. It also provides an opportunity to begin thinking about ways in which the consolidated plan requirement could be modified so as to better meet HUD goals and ultimately improve the quality of local housing and community development planning and service delivery.

Improve the integration of housing, homelessness, and community development planning. The central idea of consolidated planning — integrated housing, homelessness, and community development planning — is widely recognized to be a good one. Unfortunately, the current plan requirements neither push communities through planning requirements, nor pull them through incentives, far enough along in that direction. This is more than just a planning document requirement problem: the different political and policy histories of the CDBG, HUD, Section 8, and ESG (McKinney Act) programs make integrated planning difficult. The fact that CDBG allocations have always been formula-based rather than needs-based, and the historical separation between public housing and other local housing programs are particular problems. If HUD truly wants to promote integrated housing, homeless, and community development planning, it needs to revise current planning and policy so as to:

1. Require recipient communities to objectively identify their community development needs (not budgetary needs, as is often the case currently); to relate those needs to identified housing and homelessness needs; to require communities to set meaningful community development goals and objectives; and to identify and fund only those activities and programs that are consistent with identified goals and objectives.
2. To use discretionary performance bonuses to reward communities that do so. This idea currently stands as one of the programmatic themes of *Blueprint for HUD Reinvention*.
3. To encourage communities to combine redundant housing and community development departments or programs as appropriate, possibly through the separate provision of planning funds.

Further streamline the consolidated plan document. HUD's model for the consolidated plan was and is the CHAS. Relying on the CHAS had two advantages: (i) it provided a planning model that

seemed to work; (ii) local communities could reasonably adapt their CHAS into consolidated plans. But because the consolidated plan is much more comprehensive than the CHAS, the first-year documents that resulted — based on our review of Bay Area consolidated plans — are neither fish nor fowl. They typically include what are now superfluous details (such as a detailed housing market analysis and a section identifying barriers to the production of affordable housing), while short-changing other issues, community development in particular. Because local data and interest are generally lacking, issues such as lead-based paint, the development of anti-poverty strategies, and the identification of institutional barriers are typically treated superficially. Accordingly, many of the documents are difficult to read, and seem unbalanced in their presentations. Based on our reading of Bay Area first-year consolidated plans, we believe further streamlining is appropriate. Among possible changes:

1. Reduce the number of sections in the document to three, each with its own summary table: (i) A Needs Assessment incorporating an identification of housing and homelessness needs; the extent of joblessness and poverty; and an identification of local public and social service deficiencies; (ii) A Goals and Objectives Section (replacing the Strategic Plan) incorporating an integrated five-year identification of housing, homelessness, and community development goals, objectives, and current and proposed activities and programs designed to meet the identified goals; and (iii) A One-Year Action Plan (similar to the current one) listing proposed programs, activities, and projects; their client groups, and their funding requirements and sources.
2. Fold the Housing Market Analysis into the Needs Assessment, or include it as an appendix.
3. Eliminate the initial review of available funding resources, institutions, or programs from the Strategic Plan, or include it as an appendix. This section was poorly integrated into most of the strategic plans we reviewed; many omitted it altogether.
4. Within the Needs Assessment and Strategic Plan elements, fold what are currently separate sections on public housing, lead-based paint, persons and households with special needs, fair housing, and the number of affordable public-housing units at risk into a broader discussion of housing and homelessness needs. Either because of a lack of information or interest, most of the consolidated plans we reviewed dealt with this issues superficially, and/or failed to relate them to the broader housing needs picture.

Make the consolidated plan more of a plan, and less of an informational document. The underlying logic of the consolidated planning process is that a comprehensive and long-term identification and prioritization of needs is supposed to determine a middle-term (5-year) choice of strategies (or goals), which in turn should determine a short-term (1-year) selection of projects or activities. Mired amidst HUD's numerous documentation requirements, this fundamental logic fails to come through in almost all of the of consolidated plans we reviewed. HUD should amend its consolidated plan guidelines and required table formats so as to make the linkages between needs identification, choice of strategy or goals, and program selection clearer and more understandable. One way of doing this would be to conclude the Needs Assessment by prioritizing the various needs as high, medium, or low.

In a similar vein, the structure of the Strategic Plan should parallel that of the Needs Assessment. By this we mean that a Needs Assessment that separately identifies housing/homelessness needs,

joblessness and poverty, and social/public service deficiencies should be followed by a Strategic Plan that identifies appropriate strategies or goals for these same areas. Finally, Action Plans should follow from and directly reference Strategic Plans.

Make the roles of public participation and inter-department/inter-agency consultation more transparent. In most Bay Area communities, consultation occurred at the beginning of the consolidated planning process as a means of collecting information, while citizen participation occurred at the end — and then primarily for purposes of plan ratification. If it is HUD's goal to encourage greater citizen participation and greater consultation throughout the consolidated planning process, the agency needs to re-think how it encourages and requires those activities.

Require communities to identify lead agencies in their strategic and action plans, and identify positive steps being taken to improve inter-departmental coordination. Today's generation of consolidated plans are strong on the front end of the planning process but weak on the back end. By strong on the front end, we mean that they are generally based on sound needs assessments, leading to the development of appropriate strategies. By weak on the back end, we mean that too little emphasis is placed on implementation issues, particularly inter-agency coordination and resource-sharing. This is as true for housing and homeless activities as it is for community development; and it is even more true for housing and community development together. To improve back end performance, HUD may want to consider requiring jurisdictions to identify the lead agencies that are charged with the responsibility for implementing the Strategic and Action Plans, as well as identify the steps jurisdictions will undertake to improve inter-agency and inter-departmental cooperation. Ultimately, as part of the changes suggested in *Blueprint for a Reinvented HUD*, the agency may want to consider rewarding jurisdictions that promote inter-department planning and implementation.

A Final Caveat

Plan requirements by themselves will not produce a more integrated housing/community development delivery system. They must be augmented by financial or other incentives, continuing technical assistance, and greater program integration and flexibility at the federal funding level. In the absence of such efforts, and with some HUD programs likely to be downsized or eliminated by a hostile Congress, many Bay Area jurisdictions have thus far been reluctant to invest the resources required to re-cast planning practices and programs which, although far from optimal, are widely perceived as workable. The consolidated plans produced by Bay Area communities are a start in this direction — but they are only a start. In order to build upon them, HUD must work much harder to convince local public officials and local elected officials that HUD-required plans and HUD-funded programs provide a workable framework within which communities can identify and prioritize their own housing and community development needs, and then organize themselves to meet those needs.

List of Reviewed Documents

- Alameda County HOME Consortium. 1995. *Consolidated Plan FY 1995-FY 1999*. June.
- City of Berkeley. 1995. *Consolidated Plan for Housing and Community Development*. May.
- City of Fairfield. 1995. *Fairfield Consolidated Plan 1995-1997*. May.
- City of Gilroy. *Draft Consolidated Plan July 1, 1995 to June 30, 2000*.
- Marin County Community Development Agency. 1995. *County of Marin Consolidated Plan for FY 1995-2000*.
- City of Mountain View. 1995. *Consolidated Plan 1995-2000*. May.
- City of Napa. 1995. *City of Napa Consolidated Plan, Five Year Submission*. May.
- City of Oakland Office of Housing and Neighborhood Development. 1995. *Consolidated Plan for Housing & Community Development*. May.
- City of Palo Alto Office of Housing and Community Development. 1995. *Consolidated Plan*. June.
- Petaluma Community Development Commission. 1995. *Consolidated Strategy and Plan 1995-1999*. May 15.
- Redwood City. *Consolidated Plan FY 1995-96 to FY 1999-2000*.
- Mayor's Office of Community Development/Mayor's Office of Housing. 1994. *1995 Consolidated Plan*. December.
- San Mateo Department of Housing and Economic Development. 1995. *City of San Mateo Consolidated Plan: 1995-1999*. May.
- Santa Clara County Housing and Community Development Program. 1995. *Consolidated Plan 1995-2000*. May.
- Santa Rosa. 1995. *Consolidated Plan 1995-96 through 1997-98*. May 1.
- Sunnyvale Department of Community Development. 1995. *City of Sunnyvale Consolidated Plan: 1995-2000*. April.

Notes

¹Current proposals to "re-invent HUD" propose the gradual conversion of public housing subsidies to tenant-based rental assistance similar to Section 8 (*HUD Reinvention: From Blueprint to Action*, March 1995).

²Overall goals are listed as: "to develop viable urban communities by providing decent housing and a suitable living environment and expanding economic opportunities principally for low and moderate income persons." The primary means to achieving these goals is: "to extend and strengthen partnerships among all levels of government and the private sector, including for-profit and non-profit organizations" (Part 91.1 of title 24 of the Code of Federal Regulations, as amended January 5, 1995)

³Part 91.1 of title 24 of the Code of Federal Regulations, as amended January 5, 1995.

⁴Department of Housing and Urban Development 1994 Reinventing HUD Washington, D.C.

⁵HUD Consolidated Plan training materials, July 21, 1994.

⁶ Christopher Walker, 1993 "Nonprofit Housing Development: Status, Trends, and Prospects" Housing Policy Debate 4(3) 369-414.

⁷ Ultimately, as noted in *Blueprint for Re-inventing HUD* (1995), the agency's five dozen categorical housing and community development funding programs will be collapsed into three flexible block grant programs. If and when such a change occurs, the role of consolidated plans in guiding all federally-funded housing and community development activities would be significantly enhanced.

⁸ Department of Housing and Urban Development 1994 Continuum of Care Washington, D.C.

⁹ Consolidated Plans and CHASes were obtained from the cities of Berkeley, Fairfield, Gilroy, Napa, Mountain View, Oakland, Palo Alto, Petaluma, Redwood City, San Francisco, San Mateo, Santa Rosa, Santa Clara, and Sunnyvale; from Marin County; and from HOME consortia in Alameda County (comprising all cities except Berkeley and Oakland), and San Mateo County (comprising all cities except San Mateo and Redwood City).

¹⁰ Redwood City, Santa Clara County, and San Francisco did however make use of computer-generated maps to display housing needs and locate housing projects.

¹¹ As noted in the Federal Register, jurisdictions shall consult with other public and private agencies that provide assisted housing, health services, and social services; state or local health and child welfare agencies (concerning the extent and severity of lead-based paint hazards); adjacent units of general local government, regional housing and planning agencies, and local public housing agencies.

¹² Public housing operating and modernization programs are separate from HOME, CDBG, ESG, and HOPWA. Accordingly, HUD did not require local consolidated plans to address public housing needs or issues. Still, the fact that such issues were so tangential to Bay Area consolidated plans indicates just how isolated local public housing authorities have become from other local housing and community development initiatives.

¹³ In both cases, local politics were behind these changes. A key plank in Berkeley mayor Shirley Dean's campaign platform was to find less contentious approaches to housing assistance. Opposition to new affordable (rental) housing projects was also rising in nearby Oakland—particularly in some lower-income neighborhoods. Residents of such neighborhoods argued that compared to ownership housing, low-income housing added little to the community's economic base or its long-term social stability.

¹⁴ A prioritization of needs is currently in the Strategic Plan as Table 2. In many of the consolidated plans we reviewed, there was no apparent link between Table 2 and the community's own list of priority needs

