

**From:** [Emma Martin](#)  
**To:** [City Clerk](#)  
**Subject:** [EXTERNAL] FW: LIHTC Equity and Accessibility Request Letter to Alameda City Council  
**Date:** Tuesday, March 7, 2023 1:05:51 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
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[Alameda City Council - LIHTC Equity Requests Letter 03.23.pdf](#)

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**Emma Martin (she, hers)**  
**Community Engagement Program Manager**

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**CIL**



[Image Descriptions: The first image includes four black and white pictures from historical disability rights actions, to the right are the initials "CIL." The second image includes the "ADRC" logo in purple and yellow.]

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**From:** Emma Martin <[emartin@centerforindependentliving.org](mailto:emartin@centerforindependentliving.org)>

**Date:** Tuesday, March 7, 2023 at 1:03 PM

**To:** [tdaysog@alamedaca.gov](mailto:tdaysog@alamedaca.gov) <[tdaysog@alamedaca.gov](mailto:tdaysog@alamedaca.gov)>, [mezzyashcraft@alameda.ca.gov](mailto:mezzyashcraft@alameda.ca.gov) <[mezzyashcraft@alameda.ca.gov](mailto:mezzyashcraft@alameda.ca.gov)>, [tjensen@alamedaca.gov](mailto:tjensen@alamedaca.gov) <[tjensen@alamedaca.gov](mailto:tjensen@alamedaca.gov)>, [mvella@alamedaca.gov](mailto:mvella@alamedaca.gov) <[mvella@alamedaca.gov](mailto:mvella@alamedaca.gov)>, [clerk@alamedac.gov](mailto:clerk@alamedac.gov) <[clerk@alamedac.gov](mailto:clerk@alamedac.gov)>, [manager@alamedaca.gov](mailto:manager@alamedaca.gov) <[manager@alamedaca.gov](mailto:manager@alamedaca.gov)>

**Cc:** Jessica Lehman <[jessica@sdaction.org](mailto:jessica@sdaction.org)>, Itzel Romero <[itzel@sdaction.org](mailto:itzel@sdaction.org)>, beth kenny <[bethkenny411@gmail.com](mailto:bethkenny411@gmail.com)>

**Subject:** LIHTC Equity and Accessibility Request Letter to Alameda City Council

Dear Mayor Ashcraft, Vice Mayor Tony Daysog, and members of Alameda City Council—

My name is Emma Martin, and I am the Community Engagement Program Manager at The Center for Independent Living, a cross-disability advocacy and direct services organization serving northern Alameda County, including the city of Alameda. I am writing on behalf of The Center for Independent Living and a coalition of senior and disability organizations to request that Alameda City Council take bold and creative direct action to address equity and accessibility issues within Low-Income Housing Tax Credit (LIHTC) properties in Alameda. Through our research, coalition work, and direct action over the last several months, a group of seniors and disabled community members have discerned three ways that Alameda City Council can make an impactful difference in the realm of LIHTC units in our city.

We are requesting that Alameda City Council:

- a. Require HALF of all Low Income Housing Tax Credit (LIHTC) units to be built fully accessible for people with disabilities.
- b. Lobby the California Tax Credit Committee to increase the requirements for fully accessible units to match the needs of California households qualified for low income tax credit units.
- c. Set up a city grant fund to pay for housing modifications for disabled renters to make reasonable modifications in ALL types of housing.

We want to provide background and context to our requests above. In Fall 2022, a CIL consumer reached out to our Advocacy Team after being offered an accessible apartment at Rosefield Village, a newly redeveloped LIHTC property in Alameda. This consumer would come to find out, however, the units at Rosefield Village were accessible in name only; the modifications to make this unit accessible for this consumer would have run approximately \$20,000, and the financial responsibility would be entirely on this consumer. On a systems-level, our organizations have serious concerns about the equity and accessibility of LIHTC units to people with disabilities in our community.

LIHTC properties like Rosefield Village have shared that, in LIHTC units, the financial burden for reasonable modifications to a unit **falls on the tenant**, rather than the landlord, Housing Authority, or developer, as is generally customary in HUD-funded or federally-funded units. The material consequences of this structure is that a low-to-moderate income person with a disability has less access to LIHTC units than low-to-moderate income able-bodied people, based on the fact that disabled people are responsible for the cost of accommodations in low income housing tax credit units. Even if a disabled person is income-eligible for a LIHTC unit, they may not actually be able to live in and access the unit due to the prohibitive costs of accommodations and accessibility needs. Further, units that might actually be fully accessible are often placed outside of the income limits for people with disabilities in greatest need of affordable and accessible housing. For example, the one (1) unit at Rosefield Village that is actually wheelchair accessible is listed at 80% AMI, which is on the highest end of the AMI range of the building.

We see our three requests listed above as actionable and effective steps Alameda City

Council can take to address some of the serious affordability and accessibility concerns and true gaps within affordable housing in Alameda. We look forward to working with Alameda City Council and providing a model for other cities across California to address equity within LIHTC units, and the LIHTC system as a whole.

The Center for Independent Living plans to attend the Alameda City Council meeting on March 7th, 2023 and provide public comment advocating for our requests as written above.

Respectfully,

Emma Martin

**Emma Martin (she, hers)**  
**Community Engagement Program Manager**

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Center for Independent Living, Inc.

March 7th, 2023

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The Center for Independent Living plans to attend the Alameda City Council meeting on March 7th, 2023 and advocate for our requests as written above.

Respectfully,

Emma Martin

510-422-5085 or [emartin@centerforindependentliving.org](mailto:emartin@centerforindependentliving.org)

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