

City of Columbus  
Department of Finance and Management  
Grants Management Section

## **Draft Application for Public Comment**

U.S. Department of Housing and Urban Development  
Pathways to Removing Obstacles to Housing (PRO Housing)  
FR-6800-N-98

*September 27, 2024*

**TABLE OF CONTENTS**

**CITY OF COLUMBUS, OH  
HUD PRO HOUSING GRANT APPLICATION**

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## TABLE OF CONTENTS

Exhibit A	Executive Summary
Exhibit B	Threshold Requirements and Other Submission Requirements
Exhibit C	Need
Exhibit D	Soundness of Approach
Exhibit E	Capacity
Exhibit F	Leverage
Exhibit G	Long-Term Effect
Attachment A	Summary of Public Comments
Attachment B	Certification of compliance with NOFO public participation requirements
Attachment C	Advancing Racial Equity Narrative
Attachment D	Affirmative Marketing and Outreach Narrative
Attachment E	Experience Promoting Racial Equity Narrative
Attachment F	Leverage Documentation
Attachment G	Evidence of Partnership Letters

**EXHIBIT A  
EXECUTIVE SUMMARY**

**CITY OF COLUMBUS, OH  
HUD PRO HOUSING GRANT APPLICATION**

DRAFT

The City of Columbus, Ohio is pleased to submit this Pathways to Removing Obstacles to Housing (PRO Housing) grant application to the U.S. Department of Housing and Urban Development (HUD). Each of the proposed activities builds on work already underway in the City of Columbus to address the acute demand for affordable housing, reduce and remove barriers to creating and preserving affordable housing, and affirmatively further fair housing.

Central Ohio is at a critical inflection point. The past decade has been one of historic growth for Central Ohio, and that growth is expected to continue for the foreseeable future. Over the past 20 years, the Columbus Region's population increased by a third, adding more than 500,000 people and becoming the fastest-growing metropolitan statistical area (MSA) in the Midwest.

This growth has come at a cost—specifically by outpacing the region's supply of available housing. In the past ten years, Columbus housing prices have increased at roughly double the rate of its median household income. Columbus is projected to have a shortage of as much as 110,000 housing units by 2032. Meeting this need will require more than doubling the construction rate, from around 8,300 units per year to as many as 19,300 per year.

The City of Columbus is proposing to utilize this PRO Housing grant opportunity to fund the following activities that address this need:

1. **Enabling Equitable Transit Oriented Development (ETOD)** incentivizes development of affordable housing on complex, underdeveloped sites along high-capacity transit corridors by completing extensive pre-development site preparation work.
2. **Regional Engagement, Technical Assistance, and Capacity Building** expands the capacity of suburban communities in Central Ohio to raise awareness, knowledge, and understanding around both transit-oriented development and affordable housing in the region.

The City of Columbus Department of Finance and Management, Grants Management Section will oversee the administration of this grant. The Grants Management Team has extensive experience with HUD grants of similar size and scope. Implementation will be led by the City's Departments of Development and the Mid-Ohio Regional Planning Commission (MORPC), which are already leading the charge in addressing the region's housing crisis.

The City of Columbus pledges \$6 million in leveraged local funding to increase the effectiveness of the proposed PRO Housing activities.

The City of Columbus is committed to building new housing, preserving existing affordability, and prioritizing housing stability programs that prevent homelessness in order to ensure that our city and region will continue to grow and thrive in ways that are truly equitable and sustainable.

**EXHIBIT B**  
**THRESHOLD REQUIREMENTS AND OTHER SUBMISSION REQUIREMENTS**

**CITY OF COLUMBUS, OH**  
**HUD PRO HOUSING GRANT APPLICATION**

DRAFT

### **Threshold Eligibility Requirements**

1. **Resolution of Civil Rights Matters:** The City of Columbus does not have any outstanding charges, cause determinations, lawsuits, or letters of findings for civil rights matters listed in the PRO Housing NOFO.
2. **Timely Submission of Applications:** The City of Columbus' application will be submitted timely.
3. **Eligible Applicant:** The City of Columbus, as a unit of local government (02 City Government), is an eligible applicant.
4. **Number of Applications:** The City of Columbus is submitting only one application.

### **Other Submission Requirements**

1. **Limited English Proficiency (LEP).** The City of Columbus' PRO Housing draft application was posted to the City's website, which provides translation capabilities to French, Nepali, Spanish, Somali, and Arabic. In addition, the public notice of the grant application that was published in newspapers and sent via email included information on how to request accommodations for the grant application and public meeting.
2. **Physical Accessibility.** In effort to accommodate all persons, the public meeting regarding the City's PRO Housing grant application included both virtual and in-person options. The in-person meeting was held in a physically accessible space. All materials posted on the City's website are ADA compliant.
3. **Environmental review.** As a CDBG entitlement community and HOME participating jurisdiction, the City of Columbus understands and will comply with 24 CFR part 58 for all activities funded by the PRO Housing Grant.

**EXHIBIT C  
NEED**

**CITY OF COLUMBUS, OH  
HUD PRO HOUSING GRANT APPLICATION**

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## **Progress and commitment to overcoming local barriers to facilitate the increase of affordable housing production and preservation**

### **Improved laws, regulations or local land use policies**

**Zoning Code Update:** In 2021, the City of Columbus embarked on a major effort to assess its zoning code – the first in more than 70 years. This assessment found that the code is a barrier to Columbus being the vibrant, equitable community it aspires to be. Built around outdated ideas of what people and businesses want, the code is inhibiting creating of much-needed housing and transit-supportive development. It is also difficult to use – a product of 70 years of piecemeal amendments – creating a heavy reliance on project-by-project negotiations, variances, and rezoning to accommodate even simple projects. This is not only burdensome and inefficient for the City to administer, but it creates barriers to investment by property owners large and small.

The goals of zoning code update included:

- Modernize our zoning code to reflect our community’s current and future needs, values and aspirations.
- Support growth that prioritizes environmental and economic sustainability through improved transit, additional housing opportunities and the creation of job centers.
- Encourage thoughtful investment in neighborhoods that have experienced racial and economic segregation and help undo the harm caused by past urban development policies.
- Guide the design and development of main streets, neighborhoods and activity centers to support community goals while celebrating the unique character of our neighborhoods and creating a sense of place for residents.
- Ensure the Columbus zoning code is fair, understandable and accessible.

The resulting zoning code update, dubbed “Zone In,” was approved by Columbus City Council in the summer of 2024 and is a key framework for the Equitable Transit Oriented Development (ETOD) goals outlined in this grant proposal. The new zoning code is projected to open up the opportunity for 88,000 additional housing units in the affected areas.

**City Council Legislative Suite:** Columbus City Council has set forth a suite of legislation to address affordable housing and resident protections focused in three areas: Investment, Preservation, and Inclusion.

#### ***Investment:***

- **Retaliatory Action (Ordinance 1156-2023) - Passed April 24, 2023**  
This legislation aims to protect renters by empowering them to stand up for their rental rights without having to fear retaliation from landlords. This ordinance strengthened and clarified language from the legislation which was passed in 2018.
- **Homeownership Opportunities (Ordinance 2146-2023) - Passed July 31, 2023**  
Creating generational wealth has been an uphill battle for communities that have been

disenfranchised or redlined. This initiative will lead to partnerships with providers focusing on housing assistance and making homeownership more attainable.

- **Accessory Dwelling Unit (ADU) Pilot Program - Hearing held July 10, 2024; Passage TBD**

This program will focus on the creation of affordable accessory dwelling units on lots that currently house one single-unit dwelling. Adding an ADU doubles the amount of housing units at a low cost to the primary landowner.

***Preservation:***

- **Vacant and Foreclosure Registry (Ordinance 1995-2024 and Ordinance 1997-2024) - Passed July 15, 2024**

A registry provides the ability to have up-to-date contact information for the owners of foreclosed or vacant properties and legally hold property owners responsible for leaving abandoned properties in disrepair.

- **Homeowner Assistance Programs (Ordinance 2156-2023) - Passed July 31, 2023**

This program will expand home repair grants to homeowners to include roof repairs. Home repairs, especially roof repairs pose significant hurdles for seniors to be able to age in place.

- **Wholesaler Regulation - Passage TBD, expected to be voted on in Fall 2024**

This legislation would create licensing regulations similar to that of a realtor to prevent predatory property investment practices. Wholesalers would be required to identify themselves and meet certain requirements in order to engage in the practice in the city, such as providing basic information to residents and utilizing a local agent to oversee the process.

***Inclusion:***

- **Pay to Stay (Ordinance 2109-2023) - Passed July 31, 2023**

This legislation allows residents time to secure rental assistance dollars up until a court judgment.

- **Legal Representation at Eviction Court (Ordinance 2089-2023) - Passed July 31, 2023**

This initiative will create a more robust legal representation team at Franklin County eviction court. Currently the demand for representation exceeds the supply of legal aid attorneys.

- **Third Party Payments (Ordinance 2108-2023) - Passed July 31, 2023**

This legislation will require landlords to accept a third party payment on behalf of a tenant if that tenant is not in breach of their rental agreement.

- **Source of Income Discrimination (Ordinance 0494-2021) – Passed March 11, 2021**

Operators are prohibited from denying prospective tenants based upon their lawful source of income, including but not limited to, income derived from wages, social security, supplemental security income, public or private sources, all forms of federal, state or local assistance payments or subsidies, including rent vouchers, child support, spousal support, and public assistance.

- **Renter's Choice (Ordinance 0495-2021) – Passed March 11, 2021**  
If an operator requires a tenant to pay a security deposit, they must provide two alternatives to paying the deposit in full, including the payment of the security deposit over a series of 3 monthly installments, or the payment of the security deposit in 6 monthly installments. (Adopted March 2021)
- **Rental Receipt (Ordinance 0496-2021) – Passed March 11, 2021**  
Operators must provide tenants with a written receipt upon payment of rent or a security deposit.
- **Rent Increase Notification - Passage TBD**  
Legislation would require that tenants receive at least a 180-day notice of monthly price increase upon lease renewal.
- **Columbus Rental Registry - Passage TBD**  
A Rental Registration Program will protect the wellbeing of our residents and encourage both owners and occupants to maintain and improve the quality of rental housing. With the collection of a rental registration fee, millions of dollars will be generated and used for rental assistance, thus providing an "insurance policy" for landlords.
- **Office of Fair Housing - Passage TBD**  
Legislation would create a robust fair housing office to hold landlords/property owners accountable and to protect the rights of tenants.

#### **Other recent actions taken**

**Columbus Housing Strategy:** In 2022, Mayor Andrew J. Ginther announced the Columbus Housing Strategy, which will tackle Columbus' housing shortage to ensure housing affordability for current and future residents. The strategy recognizes how the regional shortage of market-rate, workforce, subsidized and affordable housing has particularly harmed low-income families and people of color, and threatens to cripple economic growth. At the core of the Columbus Housing Strategy is the impetus to build more housing at all price points region-wide. It calls for collaboration and investment from regional civic leadership, developers and the people who live and work in Central Ohio to double the number of housing units built over the next 15 years. Through the strategy, the City of Columbus commits to leading in this charge by reforming codes, policies and processes so that units can be built faster.

The strategy also focuses dollars and city resources to ensure more equitable outcomes in housing through three strategies:

- **Preserve** existing housing affordability to minimize displacement in growing neighborhoods. Through robust tenant protections, strategic acquisitions and home repair programs for low-income homeowners, the city will work to preserve existing affordable housing and protect residents from evictions and displacement.
- **Invest** in housing the market won't provide. Mayor Ginther outlined his request for voters to approve a new bond package that would unleash an unprecedented \$200 million to build housing that is affordable for those earning less than \$50,000 per year.

- **Include** everyone by addressing racial and economic disparities and fostering economically diverse neighborhoods. This will be achieved through inclusive housing policies, direct investment in Black homeownership and alignment of housing with transportation plans to ensure long-term connectivity. This also includes updates to the Community Reinvestment Area (CRA) residential tax abatement introduced to Columbus City Council, which will require developers to build additional affordable units in high-rent neighborhoods in order to qualify for an abatement.

**Affordable Housing Bond Package:** Building on the success of the 2019 \$50 million affordable housing bond that leveraged another \$276 million in public and private sector funds helped to build more than 1,300 affordable housing units, in 2022 Columbus voters approved another \$200 million bond package for affordable housing. These funds are proposed to be invested in four priorities:

- \$80 million for the construction of affordable rental units;
- \$50 million for affordable homeownership;
- \$40 million to preserve existing housing affordability; and
- \$30 million for programs and permanent housing for individuals and families experiencing homelessness.

With these funds, the City will continue to work with the Central Ohio Community Land Trust and other regional partners to increase affordable homeownership opportunities for middle-class families and people of color. This investment will result in permanent homeownership opportunities for individuals and families priced out of market-rate opportunities as for-sale housing prices rise. These resources will also provide investment in permanent supportive housing and other resources to stabilize families at risk of falling into homelessness.

In 2023 alone, nine affordable housing projects received bond funding support, totaling 746 new affordable units in Columbus. An additional eight projects are expected to have broken ground by the end of 2024.

**Community Reinvestment Area Tax Incentives:** Under Ohio law, the Community Reinvestment Area (CRA) Program provides real property tax exemptions for property owners who renovate existing or construct new buildings. The CRA Program allows municipalities to grant tax abatements of up to 100% for a term of up to 15 years.

In December 2023, the Columbus CRA policy was updated to expand the availability of tax incentives beyond just “distressed” neighborhoods and now includes the entire city corporate limits in exchange for affordability commitments. This expansion of the CRA program will work to keep affordable housing opportunities from being segregated in certain neighborhoods and facilitate affordable housing in opportunity-rich neighborhoods. The new policy is expected to attract investment and accelerate development of housing while promoting inclusive, mixed-income communities.

**Affordable Housing Preservation:** In 2023, Columbus preserved existing affordability and promoted housing stability by investing in programs that helped residents with loan forgiveness, down-payment assistance, home repair, as well as lead remediation.

- The Homeownership Development Program provided \$1,215,327.84 in forgivable loans and capital grants for developers and homebuyers and \$127,500 in down-payment assistance.
- The Rental Housing Preservation and Protection Program completed 36 critical home repair projects six roof replacements, 296 emergency mechanical repair projects and 37 lead remediations. Additionally, 21 Healthy Home Rehabs were completed.
- The Success Bridge Program at Columbus State Community College provided a pathway to long-term economic stability by offering students housing counseling, success coaching and emergency assistance.

**Streamlining the Permitting Process:** In addition to overhauling the city's zoning code, the City is also making changes to expedite the review process that multi-family housing projects go through. The Department of Building and Zoning Services (BZS) is working to cut in half the time it takes for more complex projects to move through the review process, which can take as long as 200 days on average. BZS has hired a new team of Project Coordinators to oversee project reviews and usher those priority housing projects through more efficiently and quickly. The City has also implemented a pilot program to waive or reimburse permit fees for small and medium-size developers, such as graduates of the Affordable Housing Trust for Columbus and Franklin County (AHT) Emerging Developers Accelerator Program (EDAP). The EDAP program is AHT's minority developer cultivation and training program designed to create pathways to development careers for groups who have historically faced barriers. Created to address the lack of affordable housing and the challenges faced by minorities entering the real estate development ecosystem, the program prepares participants to develop affordable housing by providing learning sessions, technical assistance, consulting and ultimately access to capital.

### ***Future efforts***

**Formation of a Regional Housing Coalition:** A new Regional Housing Coalition – led by the City of Columbus, the Affordable Housing Trust, and the Columbus Partnership – will work across sectors to bring municipalities, nonprofits and businesses together to tackle the region's most pressing challenge, ensuring we have enough housing to support our growing region.

**C2P2 Update:** Originally adopted in 2018, Columbus Citywide Planning Policies (C2P2) was designed to guide the next generation of development in the City of Columbus – to focus growth in a manner that supports the city's economic competitiveness, benefits the environment, and improves quality of life. C2P2 serves as the basis for land use planning within the City of Columbus and specifically addresses land use and design in development review. An update to C2P2 is planned in 2025 to be consistent with the zoning code updates adopted through the first

phase of Zone In and to set the stage for the next phase of Zone In, which will look to open up housing opportunity beyond the major corridors of the city and into its interior neighborhoods.

**Zone In 2.0:** Phase Two of the Zone In Columbus project is expected to commence in 2026 and will focus on residential zoning in Columbus' neighborhoods. Accessory dwelling units and loosening of single-family restricted areas while protecting neighborhood character are expected to be among the issues addressed by this code update.

### **Acute need for affordable housing**

Franklin County, Ohio is listed as a Priority Geography for the PRO Housing grant under the Housing Problems and Offpace Factors. This application proposes to serve the entire Central Ohio Transit Authority (COTA) Service Area, which largely follows the boundaries of Franklin County. With a county-wide focus, this application primarily serves a priority geography.

Central Ohio is at a critical inflection point. Over the past two decades, the Columbus region has enjoyed outsize population and economic growth compared with leading peer cities and the US average. Yet growth has come at a cost—specifically by outpacing the region's supply of available housing.

From 2000 to 2021, the Columbus Region's population increased by a third, adding more than 500,000 people and becoming the fastest-growing metropolitan statistical area (MSA) in the Midwest. This growth was precipitated by, and continues to benefit from, the region's mounting economic strength: from 2008 through 2021, Columbus outpaced national GDP growth by almost ten percentage points. Growth has also been bolstered by more-recent major commercial investments from a range of industries, including semiconductors, financial services, and biopharmaceuticals. This population influx has measurably strained Columbus's residential real estate and rental markets, particularly for people of color.

Although the region remains relatively affordable compared with leading peers, home prices have skyrocketed in relation to incomes. In the past ten years, Columbus housing prices have increased at roughly double the rate of its median household income. In the past four years alone, Central Ohio has experienced a 45 percent increase in median home sales prices.

New housing construction has not kept pace with population growth. From 2004 to 2022, annual construction of new single-family homes in Columbus fell by 34 percent, and it has yet to return to pre-2004 levels. In fact, for every 100 net new jobs in the region, only 65 new housing permits were issued. Columbus is projected to have a shortage of as much as 110,000 housing units by 2032. Meeting this need would require more than doubling the construction rate, from around 8,300 units per year to as many as 19,300 per year.

Renters in Columbus have also seen a price surge. Rent prices in Columbus increased by about 35 percent from 2016 to 2021, exceeding median household income growth in that period by 11 percentage points. As a result, by 2021, approximately 40 percent of renters in Columbus were spending more than 30 percent of their income on rent, meeting HUD's definition of "rent burdened." When we combine housing and transportation costs, we see an even bigger problem: nearly 50 percent of households in the Columbus metropolitan area spend over 45 percent of their annual income on housing and transportation.

Columbus outpaced its US peers in the growth of its Persons Experiencing Homelessness (PEH) population from 2008 through 2022, and reports indicate homelessness was up 22 percent in January 2023 compared with January 2022.

The racial disparities that plague many leading US regions are also starkly apparent in Columbus. One-third of the region's Black households own their homes, compared with more than two-thirds of White households. Black household incomes in the region are also about 42 percent lower than those of White households. In addition, Black residents account for 16 percent of Columbus's general population, but 60 percent of the homeless population. Black households are almost five times more likely to be overcrowded (more than one occupant per room) than White households.

### **Remaining Barriers**

The Mid-Ohio Regional Planning Commission (MORPC), the City of Columbus, and Franklin County partnered in 2020 to develop the Regional Housing Strategy (RHS).

The RHS began with a thorough investigation of existing and projected housing needs in the region, grounded by both quantitative and qualitative assessments to understand housing supply and demand throughout the region, barriers to development, and the regional housing finance landscape. From there, potential investment strategies and housing interventions were identified, based on national best practices. These strategies were vetted with regional stakeholders to better understand their regional relevance and viability, resulting in region-specific recommendations for future action. Each strategy was then aligned with the various housing submarket conditions throughout the region to help decision-makers choose among the potential interventions for implementation.

The RHA identified the following key barriers to development:

- **Not-In-My-Backyard (NIMBY) attitudes** and negative perceptions about housing density and affordability, resulting in a lack of public and political support that affects development feasibility in Central Ohio.
- **Uncertainty associated with local land use processes and standards**, driven by significant variations in local policies, processes and standards with little centralized

information to help navigate the process. This increases the time and cost of development.

- **Increasing costs of residential development**, including land costs, site selection, and regulatory costs. This can decrease production, particularly of housing at lower price points. The increased cost of construction materials and labor were identified as key drivers in the economics of residential development in Central Ohio. Since the RHS was published in 2020, inflation drove up the cost of building materials, labor, and financing in Columbus by as much as 18 percent between 2021 and 2022, and the pace of this rise in costs has only increased.
- **Need for more assistance than available resources**, across multiple fronts. From rental assistance to support for home repairs, demand dwarfs available programs. This need plays out in the region's housing finance landscape as well, where limited gap financing has created an over-dependence on Low-Income Housing Tax Credits to produce affordable housing in the region.

In addition to the barriers identified in the RHS above, additional barriers directly relevant to the activities proposed in this application include the following:

- **Complexity of Redevelopment Opportunities for Infill Housing:** Underutilized sites along major transit corridors present a significant opportunity, but there is often fractured ownership with multiple parcels, leasing and contractual obligations on the sites, aging and/or insufficient infrastructure, inefficient site plans and circulation, and buildings that need to be demolished. Most of these sites are located along the corridors that were targeted for the first phase of modernized zoning. However, zoning alone cannot overcome all of these challenges. In order to realize the repurposing of these aging retail sites into housing funding is needed on the front end to create a viable site for investment.
- **Regional Problems Require Regional Solutions.** The City of Columbus is tackling its housing crisis head-on, and has made significant progress as indicated earlier in this section of the application. But Columbus cannot fully address this problem alone. As our region has grown, we've built fences around the places of high opportunity and priced certain neighbors out from accessing those opportunities. All Central Ohio communities need to look at how our zoning codes and the regulatory and permitting challenges we put on housing development is leading to underproduction of housing to serve our region.



**EXHIBIT D**  
**SOUNDNESS OF APPROACH**

**CITY OF COLUMBUS, OH**  
**HUD PRO HOUSING GRANT APPLICATION**

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## **Vision & Proposed Activities**

The Columbus Housing Strategy aims to provide affordable housing options throughout the region. The goal is ambitious: To ensure that every family has access to affordable housing. With this goal top of mind, the following activities are proposed which build on current efforts, address remaining barriers, are consistent with extensive public and stakeholder engagement, meet CDBG LMI national objectives, and affirmatively further fair housing.

LinkUS is Central Ohio's comprehensive mobility and growth initiative. The vision for LinkUS includes rapid transit corridors connected to other transit enhancements, greenways, bikeways, and walkable development. As the population grows, LinkUS plans to bring world-class transit to Central Ohio to support equitable transit access for all.

LinkUS is expected to produce the following outcomes:

- 45 percent more service for fast, reliable trips
- 8 new COTA/Plus zones, 14 new or improved transit lines, and 5 new rapid transit corridors
- 150 miles of transit-supportive infrastructure such as sidewalks, bikeways and trails by the year 2030, and more than 500 miles by 2050
- Walkable, bikeable communities with improved safety and access to transit
- Infrastructure we need to grow our economy
- Access to jobs, housing, and services near transit
- Connections to 21 hospitals, 24 colleges and universities, 350 schools, 774 parks, and 380,000 jobs in the Central Ohio region

In September of 2024, the City of Columbus, Central Ohio Transit Authority (COTA), Mid-Ohio Regional Planning Commission (MORPC), and the Franklin County Board of Commissioners published the Equitable Transit Oriented Development (ETOD) Action Plan, which envisions housing, jobs, and services near transit so all can benefit. ETOD is a national best practice that helps guide development so that people of all incomes and abilities - especially existing residents who may have been harmed or ignored by previous infrastructure investments - experience the benefits of new development near transit.

The proposed LinkUS mobility vision includes bus rapid transit (BRT) corridors that have the potential to become vibrant centers of activity that attract new development and reinvestment, all connected by high-quality transit. ETOD ensures that all residents benefit from this new investment – not just newcomers and higher-income residents, but residents who already live there or who might be historically disadvantaged from practices like redlining and underinvestment.

The benefit of ETOD as opposed to traditional growth is that Central Ohio can be intentional about who benefits from investments and how. We can help ensure that those who have the

biggest need for better transit and new housing actually benefit from them, rather than being displaced by them.

ETOD projects take the same approach as TOD, but with additional steps to ensure those who most need transit benefit the most from area revitalization. This can look and feel different in different cities, but typically includes measures like protecting and improving housing affordability, small business funding, and zoning overlays, all of which are currently being implemented in Central Ohio.

ETOD in Columbus will foster equitable development in future transit corridors by:

- Improving housing and transportation affordability
- Preserving amenities like parks and expanding services like childcare
- Connecting residents to jobs and economic opportunities
- Stabilizing and supporting small, local businesses

Five opportunity sites have been identified as showcase sites for future ETOD along each of the three LinkUS corridors that are currently in design, for a total of 15 opportunity sites that have undergone market assessments to determine site capacity and 2035 market-supportable development potential. In total, these 15 sites could support 27,422 units of new multi-family housing, of which 11,208 are projected to be market supportable by 2035.

The market analysis for each corridor focused on identifying market supportable development for the 2035 target year. This analysis was based on the assessment of current conditions, changes in the market place, and future market demands. The ETOD study includes analysis of housing affordability, presence of essential uses, identified redevelopment opportunities, public infrastructure improvements, and recommended targeted strategies for an ETOD approach to support station area redevelopment along the various LinkUS corridors.

### **Similar Efforts and Lessons Learned**

As TOD has become more popular nationwide, concerns about rapid gentrification and displacement of existing residents and small businesses have increased. Some cities that once begged developers to build near transit stations found in time that neighborhoods changed quicker than expected, and many existing, lower-income residents were priced out. ETOD can help prevent unintended negative consequences of rapid growth along transit lines. When LinkUS comes to Central Ohio, cities want to ensure that any growth and prosperity that comes to their areas because of new transit benefits those who are already there.

Two cities taking the lead on ETOD in the United States include:

**Austin, TX** is pursuing significant transit investments in the midst of tremendous growth and a steady increase in the local cost of living. A successful 2020 referendum funded a package of public infrastructure investments, and with that, a plan to advance ETOD to

help combat any negative consequences of new transit. The 2023 ETOD Study was developed by Austin's transit agency CapMetro in partnership with the City of Austin and the Austin Transit Partnership. The Austin ETOD Study divides its work into six goals aimed at making Austin's future more equitable. Key outcomes of the ETOD work include an ETOD Policy Plan, an ETOD Policy Toolkit, public dashboards, and an extensive community engagement process.

**Chicago, IL** reviewed the impacts of its recent traditional TOD projects and concluded that not only did the overwhelming majority of recent traditional TOD occur in areas that were already growing and prospering, but that TOD actually exacerbated existing racial disparities. In partnership with a grassroots, cross-sector consortium called Elevated Chicago, the City produced an ETOD Policy Plan in 2021 that aimed to do three things: (1) Build the city's capacity to support ETOD, (2) Make ETOD required, easier, and more equitable, and (3) Embed ETOD principles into Chicago's citywide planning process. As part of their ETOD program, Chicago is currently offering ETOD Development and Pre-Development Grants to support eligible affordable housing, mixed-use, or small business ETOD.

In addition to these two examples, the ETOD Action Plan studied countless examples from across the country demonstrating best practices for preserving existing housing affordability, creating new housing with an emphasis on affordability, and including the community in addressing local and regional housing needs. Nationwide, cities are increasingly looking to ETOD as a way to not only spur housing and development in a harm-free manner for existing communities, but to create new opportunities and benefits for residents who've been traditionally underserved and overlooked. Cities use different ETOD tools in different ways, depending on local conditions. The same personalized approach would occur in Central Ohio – ETOD will differ neighborhood to neighborhood, town to town.

Market assessments estimate that one-third of workers who live along the LinkUS corridors can't afford the market-rate housing there. To help local families thrive, Columbus will focus housing growth along key transit lines to help stabilize the housing market in Central Ohio. The activities proposed in this grant application represent only a portion of this multi-pronged effort, but begins an important step in catalyzing the implementation of this vision at a critical point in time in advance of these massive transit investments.

### **Activity 1: Enabling Equitable Transit Oriented Development (ETOD)**

In order to address barriers identified including increasing costs of residential development, need for more assistance than available resources, and complexity of redevelopment opportunities for infill housing, the City of Columbus proposes to utilize PRO Housing grant funding to develop an Equitable Transit Oriented Development (ETOD) pilot program to identify redevelopment opportunities and undertake foundational pre-development work to encourage and incentivize

development of affordable housing on opportunity sites along corridors proposed for new Bus Rapid Transit (BRT) investments.

The following activities would make the sites viable for redevelopment into new affordable housing:

- **Redevelopment Planning:** Building upon the ETOD Action Plan and market studies, the City plans to procure a consultant team to prioritize and evaluate ETOD opportunity sites and determine how each site could be repurposed for housing. This planning process will include extensive community engagement to set a redevelopment vision for each site that is also responsive to the market.
- **Acquisition and assembly:** The City is currently designing an acquisition program within our Land Redevelopment Division (Land Bank). That program, once underway, would utilize PRO Housing grant funds to acquire and assemble parcels within ETOD opportunity sites. The City has already earmarked \$6 million from the Affordable Housing Bond for acquisition, which will be used to leverage PRO Housing grant funds.
- **Due Diligence:** Once ETOD opportunity sites are acquired and assembled, the Land Bank will conduct pre-development site evaluations including, but not limited to:
  - Environmental assessments
  - Surveys
  - Geotechnical assessments
  - Zoning and entitlement assessments
- **Demolition:** Existing buildings on ETOD opportunity sites are unlikely to be able to be adapted for reuse for housing. The building shapes, materials, HVAC systems, water, sanitary and power are not suited to be divided into individual housing units without great expense. It is expected that demolition of the buildings will be necessary to allow for the most efficient redesign of the sites for redevelopment.
- **Enabling Investments:** In most cases, it is expected that there will need to be additional pre-development investments in order to make the sites viable for redevelopment and desirable to developers. Given the rising cost of new construction, it will be necessary to remove the cost of the site preparation from the project in order to successfully “unlock” the site and address affordability and financing gaps. These investments could include water, sewer, stormwater, and other infrastructure; internal transportation networks and streetscapes; and/or open space and other amenities.

## **Activity 2: Regional Engagement, Technical Assistance, and Capacity Building**

In order to address the barrier of regional problems require regional solutions, as Central Ohio’s primary regional convener, the Mid-Ohio Regional Planning Commission (MORPC) will assist

the City of Columbus with the implementation of the proposed activities, outlined in the City's PRO Housing grant application. MORPC will provide support through outreach, engagement and coalition building efforts. Additionally, MORPC will provide technical assistance to jurisdictions outside of the City of Columbus but within the COTA Service Area (see Geographic Scope section below) related to the development of planning activities and services that align with the goals and strategies detailed in MORPC's Regional Housing Study.

MORPC will aid the City of Columbus with their education and outreach strategy by engaging with relevant MORPC members and partners but also with diverse communities to raise awareness, knowledge, and understanding around both transit-oriented development and affordable housing in the region. MORPC anticipates that the City of Columbus' outreach strategy, when deployed for this program, will have a heightened emphasis on underserved communities, specifically within Justice40 communities. MORPC may be called upon to participate in workshops, meetings or other events related to the work proposed in the grant application and to leverage its robust regional partner network to ensure that key stakeholders are receiving the education they need and being provided accessible outlets to provide feedback related to this project.

The MORPC Regional Housing Strategy was developed in response to the growing demand for affordable and accessible housing in Central Ohio, driven by population growth, economic changes, and shifts in housing market dynamics. Recognizing the challenges posed by rising housing costs and limited availability of diverse housing types, the strategy seeks to address housing needs in Central Ohio through the promotion of equitable, affordable, and sustainable housing options. The strategy includes:

- **Assessment of Housing Needs:** Analyzing current housing conditions and future demand to identify gaps and opportunities.
- **Equity and Inclusion:** Emphasizing fair housing practices and ensuring that diverse communities have access to housing resources.
- **Sustainability:** Promoting environmentally friendly practices in housing development.
- **Partnerships:** Encouraging collaboration among local governments, non-profits, and private sector stakeholders to address housing challenges.
- **Implementation Tools:** Providing resources, best practices, and action steps for local jurisdictions to effectively implement housing strategies through 12 identified housing submarkets.

Overall, the strategy reflects a proactive effort to foster inclusive, sustainable communities while addressing the pressing housing challenges faced by the region. As noted above, a facet of the strategy was the creation of a dynamic toolkit that serves as a resource for communities to provide a wide variety of potential housing actions based on their geographic area. Under the PRO Housing grant, MORPC would like to further the applicability of the strategy and use of this toolkit by conducting a pilot study with the City of Reynoldsburg. For the pilot study, MORPC would assist in the creation of a tailored plan for the community by examining the strategy and recommendations made by the toolkit and pairing it with information from

stakeholders and pre-existing work occurring in the community to create an implementation roadmap for some of the items identified. To illustrate this point, at present the toolkit offers 102 actions for Reynoldsburg to undertake. The goal of the pilot project would be to work with the city to strategize which of those actions would be best suited for deployment and provide a detailed report as to how that could occur. External assistance beyond MORPC may be utilized to assist in this effort; if so, MORPC would coordinate. If the pilot project is successful, it would be the goal to replicate this elsewhere throughout the region to further investment in communities' success.

### **Activity 3: Grant Administration**

The City of Columbus Department of Finance and Management, Grants Management Section will administer the PRO Housing grant, if awarded by HUD. This includes grant management, monitoring, and reporting, as well as environmental reviews and procurement as needed.

### **Alignment with Existing Initiatives**

As discussed in previous sections, this proposal aligns with and builds upon several existing planning initiatives and local land use policies – namely the zoning code modernization **Zone In**, and the regional transportation and mobility vision **LinkUS**.

All of this aligned work can be tracked back to **Insight2050**, a collaborative initiative led by MORPC in 2015 and designed to help communities proactively plan for development and population growth over the next 30+ years that is expected to be dramatically different from the past. The initiative has produced two regional analyses and data-rich reports that enable local and regional policy makers, business leaders, developers, and public stakeholders to evaluate the effect of future land use decisions on specific factors that influence our communities' quality of life. Insight2050's **Corridor Concepts Study** was released in 2019 and looked at various future development patterns along selected major thoroughfares. This study is helping Central Ohio communities to understand the impacts of various development patterns, as well as the relationship between these corridors and various types of high-capacity transit technologies. Insight2050 and Corridor Concepts are directly responsible for **ZoneIn** and **LinkUS**.

In addition to Insight2050, MORPC, the City of Columbus, and Franklin County partnered in 2020 to develop the **Regional Housing Strategy (RHS)**. The RHS began with a thorough investigation of existing and projected housing needs in the region, grounded by both quantitative and qualitative assessments to understand housing supply and demand throughout the region, barriers to development, and the regional housing finance landscape. From there, potential investment strategies and housing interventions were identified, based on national best practices. These strategies were vetted with regional stakeholders to better understand their regional relevance and viability, resulting in region-specific recommendations for future action. Each strategy was then aligned with the various housing submarket conditions throughout the

region to help decision-makers choose among the potential interventions for implementation. The Implementation Toolkit that was developed through the RHS will be put to use by MORPC

Also notably, the Central Ohio Transit Authority (COTA) was awarded a \$1.2M grant from the US Department of Transportation through the Pilot Program for TOD Planning, which helps support the Federal Transit Administration's mission to improve America's communities through public transportation by providing funding to local communities to integrate land use and transportation planning with a new fixed guideway or core capacity transit capital investment. These funds will provide the ETOD analysis for the remaining 12 stops along the West Broad BRT. It will also have extensive community involvement and determine the specific policies and tools that will be used to advance ETOD along the corridor. Work on this grant will begin in late 2024. COTA has also applied for this same grant for the East Main Street LinkUS corridor and will likely know in 2025 if they receive that funding. COTA will also apply for this grant for the Northwest Corridor when this grant is offered again by USDOT.

## **Environmental Risks**

In 2021, the City of Columbus released its first-ever Climate Action Plan, a community roadmap to achieve carbon neutrality by 2050 and a 45% reduction of greenhouse gas emissions by 2030 and to promote equity and environmental justice while pursuing a carbon-neutral Columbus. The Climate Action Plan was developed with input from residents, environmental advocates, and the business community, and outlines mitigation strategies to reduce greenhouse gas emissions and adaptation strategies to equitably promote greater community resilience against climate change. The plan will be updated on a five-year basis to ensure optimal accountability, transparency, and alignment with the latest circumstances and climate science.

PRO Housing funded activities will utilize mitigation and adaptation strategies developed in the City's Climate Action Plan in order to support a healthy, resilient, and sustainable community. The Enabling ETOD activity will result in the redevelopment of outdated and inefficient land uses, replacing them location-efficient, energy-efficient buildings that incorporate elements recommended in the Climate Action Plan such as:

- Increased development density
- LED streetlights
- Equitable access to green space
- Water adaptation strategies
- Increased tree canopy
- On-site solar

In addition, in compliance with program requirements, any projects funded for development using PRO Housing funding will undergo an environmental review to determine that the proposed project does not negatively impact the environment nor have an adverse environmental or health effect on residents. City of Columbus staff has significant experience with



implementing HUD-funded affordable housing programs and will ensure all development projects funded comply with environmental requirements.

## **Implementation Roadblocks**

The most significant potential roadblock that might impede implementation of this proposal is the LinkUS ballot initiative planned to be voted on by Franklin County voters in November 2024. This ballot initiative proposes a 0.5% increase in Franklin County sales tax, bringing the amount of sales tax dedicated to the Central Ohio Transit Authority (COTA) to the maximum 1.0% permitted under Ohio law (and bringing the total sales tax up to 8.0%). This sales tax increase is estimated to provide \$6.2 billion in new revenue through 2050 to support implementing the LinkUS regional transit and mobility vision. If voters do not approve this sales tax increase, much of the anticipated investment along the proposed rapid transit lines, and the corresponding station areas, would be greatly diminished, as would be the need for ETOD planning around station sites as proposed in this grant application.

## **Geographic Scope**

The geographic scope of this proposal is the entire Central Ohio Transit Authority (COTA) Service Area (see Figure 1 below). The Enabling ETOD activity will focus on the LinkUS Corridors and Opportunity Sites (see Figure 2 below) that were studied in the ETOD Action Plan.

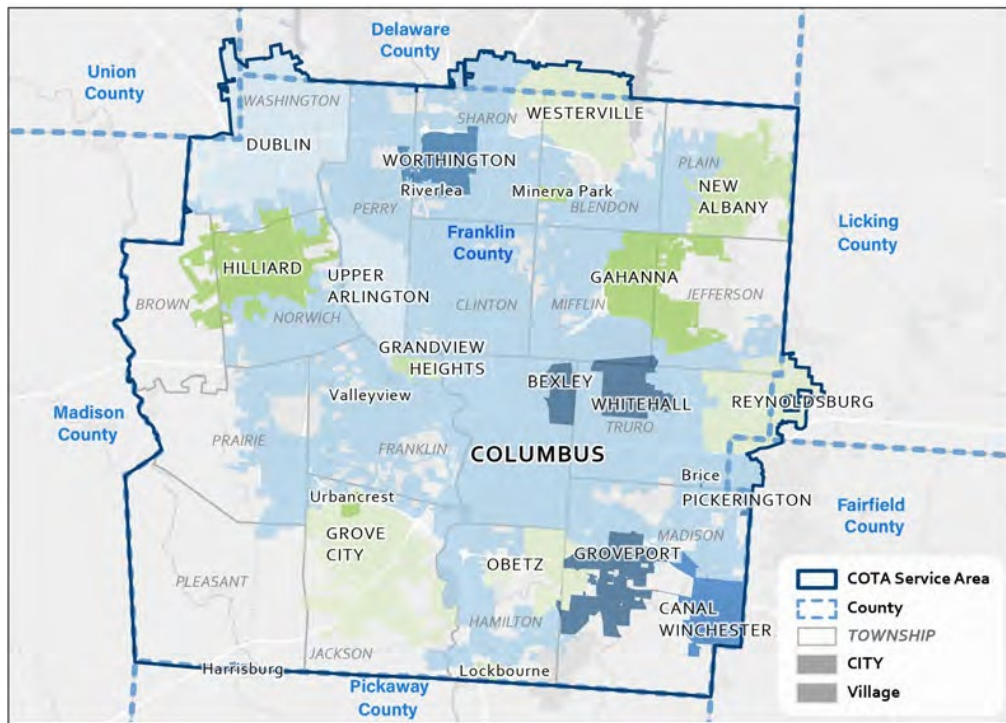
The West Broad Corridor connects key destinations, neighborhoods and job centers. Key destinations include Ohio Health Doctors Hospital, Franklin Township, Prairie Township, Hollywood Casino, Hilltop, Westgate, Franklinton, Downtown Columbus, Franklin University, and Columbus State Community College. However, 76% of the corridor is located in areas with persistent opportunity gaps.

The East Main Corridor provides access to jobs, businesses, schools and communities, including Downtown Columbus, Olde Towne East, King-Lincoln/Bronzeville, Near East Side, Franklin Park, Eastlawn, Mideast, Bexley, Whitehall, Far East, and Reynoldsburg. However, 63% of the corridor is located in areas with persistent opportunity gaps.

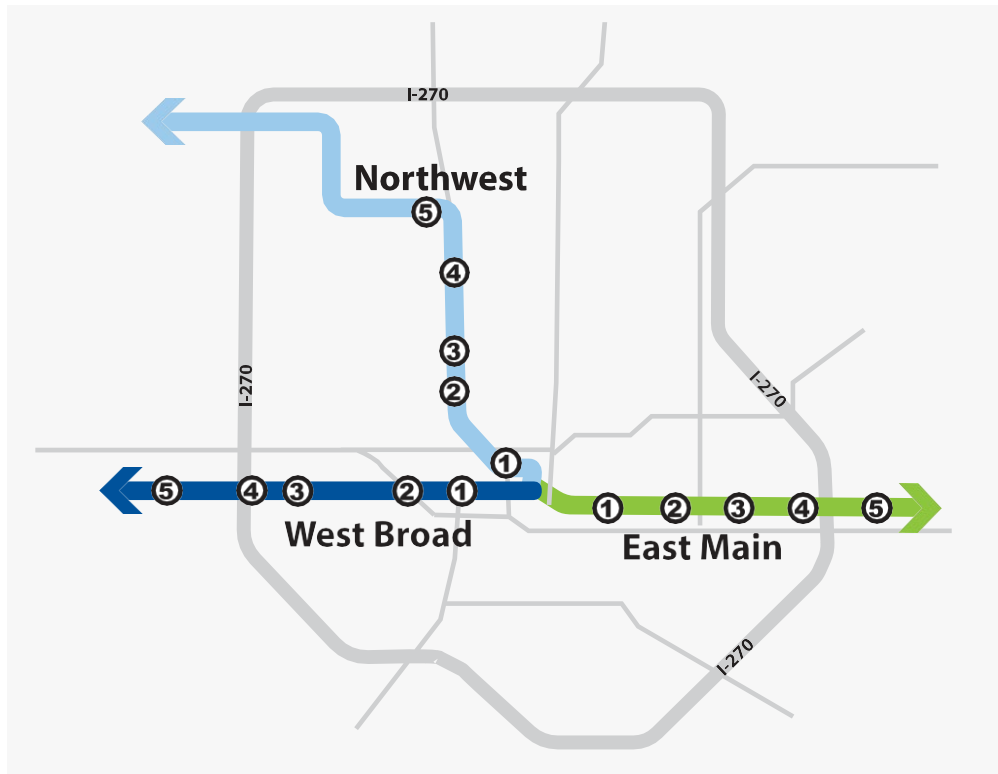
The Northwest Corridor is one of Central Ohio's most critical transportation connections, linking major institutional and employment centers including The Ohio State University, the Ohio Health hospital campus, Grandview Yard, Downtown and the Arena District. This corridor includes 30% of all jobs in Franklin County and is projected to increase in population by 50% by 2040.

For the West Broad and East Main Corridors, LinkUS and ETOD investments will **expand opportunity in underserved communities**. For the Northwest Corridor, the focus is to **preserve and create housing units in this high-opportunity area**. ETOD policies will ensure that a

significant portion of the new housing built along the LinkUS corridors will achieve affordability for 80-120% Area Median Income (AMI) households, as well as households earning below 50% AMI, in both rental and ownership supply.



**Figure 1: The COTA service area is made up of 17 cities, 8 villages, and 17 townships**



### *LinkUS Corridors and Opportunity Sites*

### **Stakeholder Engagement**

The Equitable Transit-Oriented Development (ETOD) Steering Committee represents a variety of civic, business, and community leaders who met throughout 2024 to discuss the potential for ETOD in Central Ohio and to outline the action steps reflected in this proposal.

Throughout 2024, the ETOD Steering Committee worked to determine not only how ETOD could look and feel in Central Ohio, but what concrete steps are needed to make it happen. This diverse group of 50 neighborhood leaders, housing advocates, affordable housing developers, elected officials, and professional staff held robust debates, analyzed policies from other places and engaged in spirited roundtable discussions.

The ETOD Steering Committee will continue to meet through the PRO Housing grant's period of performance and the ETOD Action Plan will continue on as a living document with subsequent editions that evolve as the community conversation and political framework around LinkUS and ETOD itself grows and evolves.

Lead agencies including the City, MORPC, and COTA will continue to work with stakeholders in each corridor on a defined property assembly strategy and approach consistent with ETOD

implementation goals. Ongoing, in-depth conversations with property owners, community leaders, residents, workers, business owners, local developers, real estate brokers, local and regional philanthropies, and many others will be necessary to implement a comprehensive ETOD strategy for each corridor.

As ETOD implementation continues, we will take deliberate steps to engage traditionally marginalized groups within the community throughout the process. Official partnerships with neighborhood navigators can begin to repair old patterns of marginalization and show neighborhoods that ETOD is about righting past wrongs and creating a future together. Partnering with neighborhood representatives in an official, paid capacity is a new ETOD best practice to help ensure ETOD best represents what residents actually want.

The ETOD Action Plan built upon previous engagement through a range of regional planning processes in which residents have consistently voiced support for more and better transit, safer pedestrian and cycling experiences, more mixed-use development, and managing traffic congestion. The following community engagement processes all captured community viewpoints that guide the LinkUS vision's equitable approach to growth in Central Ohio:

- Insight2050 (2015)
- COTA NextGen (2017)
- Age-Friendly Columbus Strategic Plan (2017)
- ULI's insight2050 Corridor Concepts (2019)
- Franklin County Rise Together Blueprint on Poverty (2019)
- MORPC Regional Housing Strategy (2020)
- Columbus Climate Action Plan (2021)
- LinkUS Locally Preferred Alternative (LPA) reports for West Broad (2021), East Main (2021), and Northwest corridors (2022)
- MORPC 2024-2050 Metropolitan Transportation Plan (2022)
- Columbus Housing Strategy (2022, 2023)
- Zone In Columbus (2024)

These processes represent engagement with thousands of residents and included local and regional public agencies that provide funding or technical assistance for housing, transportation, and social services; community organizations, especially those that represent protected classes; private and non-profit housing developers; community land trusts; advocacy organizations and legal groups; business and civic leaders; and others.

In addition to that extensive previous outreach, the following outreach was conducted specifically in the process of developing this proposal:

- The draft application was emailed to a contact list maintained by the Grants Management Section, which includes civic organizations, public agencies, non-profit and for-profit housing developers and advocates, and other interested organizations.
- Several consultation meetings were held with individual organizations to discuss and prioritize proposed activities.

- The public notice announcing the draft application and public meeting was published on September 27, 2024 in the *Columbus Dispatch*, the most widely distributed newspaper in Central Ohio.
- The draft application was posted for public review on the City of Columbus website.
- A public meeting was held on October 9, 2024 at 4:30pm in the City's 141 N. Front St. conference room, which is attached to a parking garage and provides free parking for attendees as well as transit- and handicapped-accessible.
- Members of the public were provided the opportunity to submit comments in writing by email, mail or hand delivery from September 27, 2024 through October 13, 2024.

### **Affirmatively Furthering Fair Housing**

The City of Columbus and Franklin County have jointly prepared a fair housing study known as an Analysis of Impediments to Fair Housing Choice. This study discusses patterns of race, housing, and poverty; access to opportunity; and housing barriers in the region. It also outlines strategies the City and County may take to improve housing choices for their residents.

Based on the data and public input collected for that analysis, the following fair housing impediments were identified:

1. Affordable Housing Options Lack Access to Opportunity Features
2. Neighborhoods with Low Access to Opportunity
3. Households of Color Have Reduced Access to Homeownership
4. Protected Class Face Greater Housing Instability
5. Continued Need for Fair Housing Outreach, Education, and Enforcement
6. Inadequate Compliance with Housing Accessibility Requirements
7. Zoning Code Provisions Limit Housing Choice

### **Racial Composition of Expected Beneficiaries**

The activities that compose this proposal will have a cumulative impact to the entire COTA Service Area, which with a few small exceptions follows the boundary of Franklin County, Ohio. The racial composition of the persons expected to benefit from these activities, therefore, reflect that of Franklin County as a whole:

White alone	69.2%
Black or African American alone	21.2%
American Indian and Alaska Native alone	0.2%
Asian alone	3.9%
Native Hawaiian and Other Pacific Islander alone	0.1%

Two or More Races	2.3%
Hispanic or Latino	4.8%

### **Access to Opportunities and Desegregation**

This proposal will remove barriers to the development of affordable housing in well-resourced areas of opportunity by focusing ETOD efforts along corridors expected to see unprecedented transit investments in the coming years, which will increase access for underserved groups to live and work in these areas. These are areas where there are existing employment, educational opportunities, transportation options, and other resources that allow residents to access most of their daily needs, all without requiring them to own and maintain their own vehicle to do it.

This proposal will increase access for underserved groups to these areas by ensuring that a portion of new units are set aside for Low- to Moderate-Income households, particularly in the Northwest Corridor which is already a high-opportunity area. We will also enact anti-displacement strategies in the West Broad and East Main corridors, which currently have persistent opportunity gaps, which will ensure that current residents and tenants in these corridors have the ability to stay as these areas see additional investment and improvements in resources and opportunities.

### **Promoting Desegregation, Anti-Displacement, and Access to Opportunity**

In Central Ohio, historic infrastructure investment patterns and housing discrimination made residents of color more economically vulnerable. As a result, they are now disproportionately experiencing the rise of rent burden, homelessness, and long, costly commutes. Many past decisions in the region are at fault for these inequities, including redlining, restrictive covenants, and highway construction that tore apart communities and cut residents off from economic opportunities, and local zoning policies that excluded multifamily and affordable housing.

According to Columbus and Franklin County's most recent Joint Analysis of Impediments to Fair Housing Choice, segregation has consistently declined in the past few decades in the City of Columbus and the region for all groups except the Hispanic/White pairing, which has slightly increased. Segregation levels calculated by census tract in Columbus and the region were low or moderate for all group pairings.

The ETOD strategies outlined in this proposal are specifically tailored to build on our progress of desegregation through anti-displacement measures that guide investment to where it's most needed and in ways that ensure that our longest-tenured residents – often those who lived through the disinvestment of yesterday – are the ones who benefit. Our proposed ETOD policies are designed to incentivize affordable housing with financial incentives that create mixed-income developments along transit corridors. They will also allow tenants and/or non-profits the first right of refusal when units are being sold, pursue wealth-building for existing tenants when

converting rentals to ownership opportunities, and prioritize real estate and development deals that maintain community ownership and affordability.

Columbus City Council's "Housing For All" agenda has adopted, and plans to adopt several more, legislative strategies to support residents at risk of displacement such as stronger protections for renters and eviction prevention. The City of Columbus has also adopted a Residential Antidisplacement and Relocation Assistance Plan, which outlines the City's responsibility to minimize the displacement of and provide relocation assistance to individuals impacted by activities supported through U.S. Department of Housing and Urban Development funding. This plan was passed by Columbus City Council on January 9, 2023.

In addition, the City has a robust homeowner support framework including assistance funds, home repair programs, emergency assistance, tenant's rights legal assistance, property tax relief for seniors and low-income homeowners, and more, to preserve existing affordable housing and prevent displacement as property values rise.

This proposal will not cause affordable housing to be further concentrated in low-opportunity areas or in areas that already have ample affordable housing because the emphasis will be on corridors that are either already high-opportunity areas, or corridors that currently have persistent opportunity gaps that are expected to experience unprecedented transit investments that are anticipated to greatly increase access to opportunity in those areas.

### **Unique Housing Needs of Protected Class Groups**

The disproportionate representation of several protected class groups in low and middle income levels can lead to unequal access to housing options and neighborhood opportunity in high-cost housing markets. Black and Hispanic residents, immigrants, people with disabilities, and seniors often experience additional fair housing barriers when affordable housing is scarce. As described above, the proposed activities will address the needs of protected class groups by increasing access to affordable housing in high-opportunities areas, enhancing the resources in currently low-opportunity areas, as well as reducing barriers to overall housing production to reduce the regional housing supply shortage. The City will require that ETOD development partners receive robust fair housing and civil rights training and affirmative marketing requirements to ensure that protected class groups are included in housing opportunities.

### **Housing Needs of Persons with Disabilities**

According to the most recent Analysis of Impediments to Fair Housing, an estimated 13% of persons 5-years-old or older in Columbus have a disability, and people aged 18-64 have both the largest number of people with disabilities and the highest disability rate. Searches using HUD's Affordable Apartment Search Tool and apartmentguide.com for apartments with accessibility features currently for rent in the Columbus area were conducted and returned limited results, particularly for units priced at \$900 or less per month.

People with disabilities are dispersed throughout the city and county and there is no evident clustering or other inequitable geographic distribution of residents with disabilities within the city of Columbus or Franklin County.

Through our proposed activities, we will implement policies and practices to create accessible units in areas that support independent living with access to supportive services and transportation. All projects funded through this grant will comply with the Americans with Disabilities Act (ADA) and accessibility requirements under the Fair Housing Act and must be sensitive to Universal Design and visitability standards, which will be included as part of a proposed project's evaluation through the ETOD scorecard.

## **Diversity & Equity**

Compared with peer metro areas, Central Ohio has slower small business growth and bigger disparities in business ownership among women and people of color. Additionally, many new jobs are created outside the urban core and outside of the transit system. With nearly 40,000 households in Franklin County lacking access to a personal vehicle or affordable transportation options, these jobs are out of reach for many. 30% of Franklin County residents live in areas of low or very low opportunity, according to the Kirwan Institute.

Expanding opportunity will require a coordinated housing-and-jobs strategy. In addition to the more than 27,000 new housing units that could be supported by the 15 ETOD Opportunity Sites that were studied, we could see 2.4 million square feet, or 42 football fields, of new commercial and industrial development, which will provide a variety of employment opportunities for our local workforce. Inspiring small business growth and encouraging job growth in transit-rich areas is a great example of how ETOD can impact the lives of Central Ohioans. Continued coordination with regional partners like One Columbus, the Columbus Chamber of Commerce, and the Columbus Urban League on retaining and growing businesses that enrich the lives of Ohioans and our communities is critical.

The ETOD Action Plan addresses goals and policies to:

- **Preserve** existing jobs and businesses, using tools like booster grants, access to short-term loan funds, and storefront and façade grants to embody equitable development goals;
- **Create** new business investment and jobs by supporting mixed-use development and jobs-housing balance, expanding and aligning existing economic development programs in transit corridors, and undertaking infrastructure improvements that support job creation; and
- **Include** area businesses and stakeholders in addressing jobs and economic development needs by minimizing displacement of existing businesses and jobs within each corridor, working with community partners and small business support organizations to promote



existing business assistance, and leveraging resources to help smaller local businesses and establish new entrepreneurial programs.

The City of Columbus Office of Diversity and Inclusion (ODI) is responsible for supporting Mayor Ginther and his Cabinet Leadership Team by advancing efforts to shape Columbus into “America’s Equal Opportunity City”. ODI supports opportunities for every individual, family and community to share in the economic prosperity of Columbus.

The City’s equity agenda, dubbed “Opportunity Rising,” outlines 21 aspirations that we have for every Columbus resident. In order to get everyone to a place of opportunity, we’ll need to think, act and invest our resources equitably.

To achieve the aspirations of Opportunity Rising, the City of Columbus will boldly collaborate with partners and residents, growing prosperity by dismantling racism together. This will benefit every Columbus resident through the community’s improved economic stability, stronger health and wellbeing, and safer, more resilient neighborhoods.

### **Evaluation & Tracking Progress**

The LinkUS ETOD Steering Committee will maintain transparency with the community and work with neighborhoods on development goals and processes, maps of targeted locations, community updates, and encouragement for developers of all sizes. ETOD Scorecards will be developed to evaluate all development projects and to track performance with local ETOD goals. Monitor for neighborhood change using data that measures community indicators of physical and economic change and potential for exclusionary or displacement effects. Observing these changes in neighborhood data will allow us to spot trends early and intervene when necessary.

### **Affirmative Marketing**

The Columbus Housing Division has incorporated affirmative marketing requirements into all housing finance and incentive programs it administers with HUD funds and will require affirmative marketing for all projects funded through the HUD PRO Housing grant. Applications must submit an Affirmative Fair Housing Marketing Plan (AFHMP) as part of an application package. In the Affirmative Marketing Plan, applicants must describe 1) the type of Fair Housing training project staff and/or marketing agents have received; 2) any Fair Housing complaints, for any of its properties, received in the last 12 months, the nature of the complaints, and the current status; 3) how they will notify applicants and tenants of Fair Housing rights; and 4) the target market area, groups least likely to apply and how that was determined, and proposed outreach and marketing strategy for each group identified.

## **Budget and Timeline**

### **Activity 1 – Enabling ETOD**

- PRO Housing Funds Requested: \$6,150,000
- Leveraged Funds: \$6,000,000
- Total Activity Budget: \$12,150,000

Industry standards and consultant rates on similar projects informed the budget for this activity. There are many unknown budget factors at play within this activity such as land acquisition, demolition, and infrastructure costs, so approximations and estimates were used based on past and current experience.

The first six months of this activity will focus on procuring a redevelopment planning consultant that will be selected through a competitive procurement process, followed by one year of redevelopment planning activities for the ETOD opportunity sites. The remainder of the grant period will see multiple opportunity sites progress at different rates through the various stages of pre-development site preparation: acquisition and assembly, due diligence, demolition, and enabling infrastructure investments.

<b>Activity</b>	<b>Budget</b>	<b>Timeline</b>
Redevelopment Planning/Design	\$150,000.00	Months 1-18
Procurement		Months 1-6
Planning		Months 6-18
Site Acquisition & Assembly	\$2,400,000.00	Years 2-6
Due Diligence	\$300,000.00	Years 2-6
Demolition	\$1,200,000.00	Years 2-6
Enabling Infrastructure	\$2,100,000.00	Years 2-6

The leveraged funds for this activity come from the City of Columbus Affordable Housing Bond Fund, which has pledged \$6,000,000 to support land acquisition costs for this activity.

### **Activity 2: Regional Engagement, Technical Assistance, and Capacity Building**

- PRO Housing Funds Requested: \$250,000
- Total Activity Budget: \$250,000

The Mid-Ohio Regional Planning Commission (MORPC) is budgeting \$250,000 for regional engagement, technical assistance, and capacity building. This represents a first-year investment of \$125,000 for the planned pilot study with the City of Reynoldsburg, followed by \$25,000 per year in years 2-6 for ongoing outreach and engagement.

Activity	Budget	Timeline
City of Reynoldsburg Pilot Study	\$125,000.00	Year 1
Ongoing Outreach & Engagement	\$125,000.00	Years 2-6

### Activity 3 - Grant Administration

- PRO Housing Funds Requested: \$600,000
- Total Activity Budget: \$600,000

The City of Columbus is budgeting \$600,000 for grant administration. This largely represents consultant costs related to performing environmental reviews for the proposed projects and is based on prior experience and consultant rates on similar projects.

Activity	Budget	Timeline
Environmental Reviews	\$600,000.00	Years 1-6

### **Total Project Budget**

**Total PRO Housing Funds Requested: \$7,000,000**

**Total Leveraged Funds: \$6,000,000**

**Grand Total: \$13,000,000**

**EXHIBIT E  
CAPACITY**

**CITY OF COLUMBUS, OH  
HUD PRO HOUSING GRANT APPLICATION**

DRAFT

## **Capacity and Staffing Plan**

### **Applicant Capacity**

The City of Columbus Department of Finance and Management, Grants Management Section, coordinates financial and regulatory aspects of the following grants: CDBG, HOME, ESG, HOPWA, NSP, and HOME-ARP. The Grants Management Section is responsible for federal grant compliance; monitoring executions; data collection and reporting on federal grant accomplishments, outcomes, and expenditures; Annual Action Plan development; Citizen Participation Plan execution; and supporting City internal departments and external partners through trainings and meetings to ensure compliant and timely programming execution.

Highlights of the Grants Management Section's work includes:

- Directly managing subrecipient agreements for the City's annual CDBG entitlement award (on average \$7,500,000);
- Administration of IDIS, HUD Consolidated and Annual Action Plans;
- Directly conducting and managing HUD Environmental Review Records for the City of Columbus and Columbus Metropolitan Housing Authority;
- Receiving approval from HUD on a HOME-ARP Allocation Plan for \$16,433,138; and
- Applying for and receiving \$500,000 in CDBG-CV funding from the State of Ohio;

The Grants Management Section is led by Lucie McMahon, Grants Management Coordinator, and is supported by four Management Analysts. The team possesses the necessary project management, quality assurance, financial and procurement, and internal control capacity to successfully manage the implementation of activities requested for funding in this application. In collaboration with City departments designated to lead implementation of each proposed activity, Grants Management will oversee and ensure the timely and compliant expenditure of PRO Housing funds.

The City's Land Bank, within the Department of Development, Land Redevelopment Division, will lead implementation of the Enabling ETOD activity. Created in 1994, the City's Land Bank is one of the oldest land bank programs in the country, and actively pursues vacant and abandoned real estate primarily through tax foreclosure. In 2009, the program became an essential part of the City's Neighborhood Stabilization Program (I, II, and III) Plan to address the foreclosure crisis. Since NSP, the Land Bank collocated with the County Land Bank and partnered to acquire over 3,500 vacant and abandoned properties within Columbus – an inventory that serves as a basis for most affordable housing projects in the City. The PRO Housing grant will better equip the Land Bank to acquire larger commercial sites and provide the City with an inventory to increase the number of affordable multi-family and mixed-use developments. The Land Bank is led by John Turner, Administrator, who has worked with the City Land Bank since 2007. He brings 25 years of experience in real estate and development, including experience working for a community development corporation and as a city planner. He has extensive experience working with HUD grants and other federally-funded programs, and

is supported by a qualified team of professionals, including development program coordinators, real estate asset managers, and office assistants.

The City's Department of Development, Housing Division, will assist the Land Bank in the implementation of the Enabling ETOD activity. The City's Housing Division serves Columbus through the preservation and production of housing that builds strong and vibrant neighborhoods, and collaborates with federal, state, and local government housing agencies to strategically target its resources for neighborhood investment. The Housing Division has extensive experience working with and coordinating partners in large-scale projects, such as through the "Zone In Columbus" initiative (a comprehensive effort to modernize Columbus' zoning code for the first time in more than 70 years), and on a micro-level through technical assistance, trainings, and communications with contractors, funders, subrecipients, community stakeholders, and other government agencies.

This assistance will be led by Erin Prosser, Deputy Director of Housing Strategies, who has served the City since 2021. In May 2021, she was named the City of Columbus's first-ever Assistant Director of Housing Strategies. In this position, Prosser leads the City's efforts to address the lack of affordable housing, encourage the development of mixed-income neighborhoods, and coordinate with community leaders to build a more inclusive and equitable Columbus. Before joining the City, Prosser served as the Director of Community Development in the Department of Planning, Architecture and Real Estate at The Ohio State University, and as a Planner and Project Manager at MKSK Studios. She holds a Bachelor's Degree in Philosophy from Bowling Green State University and a Master's Degree in City and Regional Planning from the Ohio State University.

The City of Columbus possesses the leadership capacity and legal authority to effectively implement the proposed activities. The City is administered by a Mayor, a Council, an Auditor, and an Attorney. The Mayor leads the administrative branch of the City, which includes the City Departments that will lead implementation of PRO Housing activities. City Council acts as the legislative branch of the City, and enacts legislation necessary for the operation of the City. The Mayor's administration and City Council collaborate regularly to ensure City priorities are being met. Additionally, Ohio cities have Home Rule authority. Section 3 of Article XVIII of the Ohio Constitution states: "Municipalities shall have authority to exercise all powers of local self-government and to adopt and enforce within their limits such local police, sanitary, and other similar regulations, as are not in conflict with general laws."

The Mid-Ohio Regional Planning Commission (MORPC) will lead implementation of the Regional Engagement, Technical Assistance, and Capacity Building activity. MORPC is the regional voice, trusted convener and catalyst, bringing Central Ohio communities together to collaborate on best practices and plan for the future growth and sustainability of the region. As the regional council for the Central Ohio Region, MORPC's core responsibility is to facilitate the region's transportation planning process. As such, they are experts in facilitating federal funding

and financing, and acting as a bridge to convene and connect local governments to work collaboratively to drive holistic regional value.

The City of Columbus, Department of Finance and Management, Grants Management Section prepared this application. Specifically, the lead grant writers were Scott Ulrich, Management Analyst II; and Gabrielle Kennedy, Planner II.

## **Fair Housing and Civil Rights Experience**

The City of Columbus is dedicated to affirmatively furthering fair housing. Columbus City Council passed the “Housing for All” legislative package in 2021, which amended Chapters 4501 and 4551 of Columbus City Code, to focus on dismantling the systems that have perpetuated racism and inequality within housing work in order to advance fair, affordable housing. The City believes that housing is a human right, and is committed to ensuring every resident in Columbus has a safe, decent, affordable place to call home.

The City of Columbus and Franklin County jointly prepared an Analysis of Impediments to Fair Housing Choice, which addresses patterns of race, housing, and poverty, access to opportunity, and housing barriers in the region. This effort included working with data to analyze racial and economic disparities.

The Grants Management Section continues to manage a Fair Housing subrecipient agreement with a local non-profit in Columbus to provide fair housing testing, investigation, education, and outreach to low-to-moderate income residents of the City of Columbus.

## **Organizational Charts**

*Department of Finance & Management, Grants Management Section:*

Lucie McMahon, Scott Ulrich, Kyle Nolan, and Gabrielle Kennedy will be responsible for compliance and oversight of all proposed PRO Housing activities.

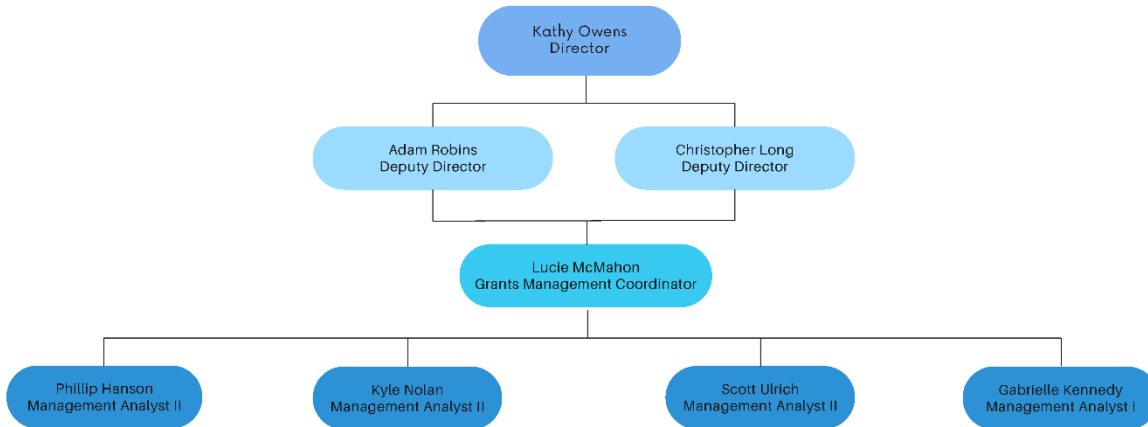
Key Management – Lucie McMahon, Grants Management Coordinator  
Full-time Staff –

- Scott Ulrich, Management Analyst II
- Kyle Nolan, Management Analyst II
- Gabrielle Kennedy, Management Analyst I

There are no vacancies or positions contingent on award in the Grants Management Section.

## CITY OF COLUMBUS

Department of Finance and Management  
Grants Management Section



### *Department of Development:*

The Land Redevelopment Division will be responsible for implementing the Enabling ETOD activity.

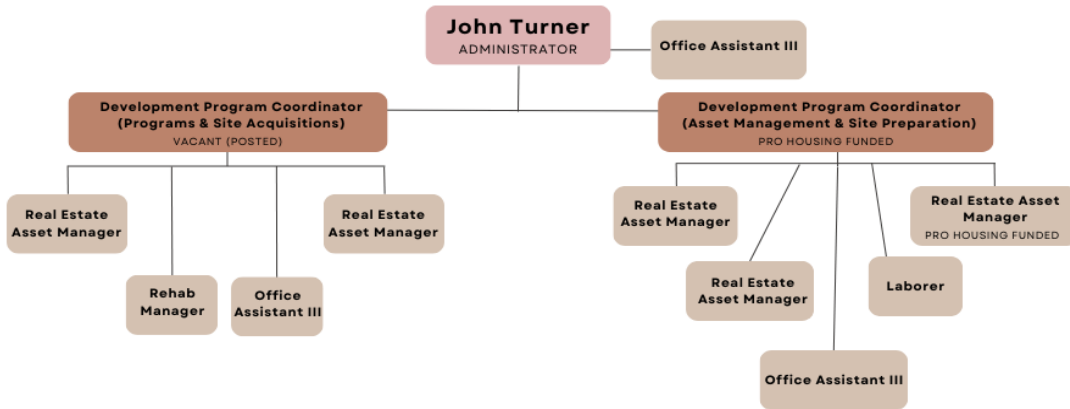
Key Management – John Turner, Administrator  
Full-time Staff –

There is currently an active posting for a Development Program Coordinator role that manages Land Bank acquisitions, coordinates with developers for redevelopment applications, manages various Land Bank initiatives for affordable housing, and oversees funding for the Community Land Trust program.

This application requests funding for an additional Development Program Coordinator to oversee site preparation activities, including site clearance, environmental remediation, and infrastructure suitability, maintenance of land bank holdings, and coordination with City departments on initiatives to address vacant and abandoned property. This would be a split-funded position between PRO Housing and City General Fund resources. This application also requests funding for a Real Estate Asset Manager to manage PRO Housing grant funding, including compliance, monitoring, and reporting requirements.



## LAND REDEVELOPMENT DIVISION

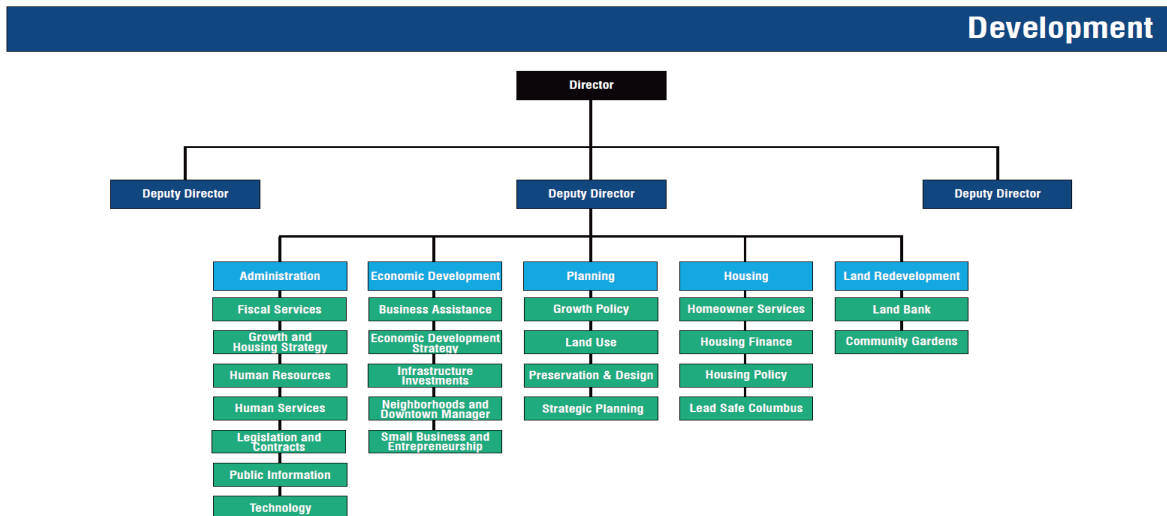


The Housing Division will be responsible for assisting the Land Bank with the Enabling ETOD activity.

Key Management – Erin Prosser, Deputy Director of Housing Strategies

There are no vacancies or positions contingent on award in the Housing Division.

**Development**



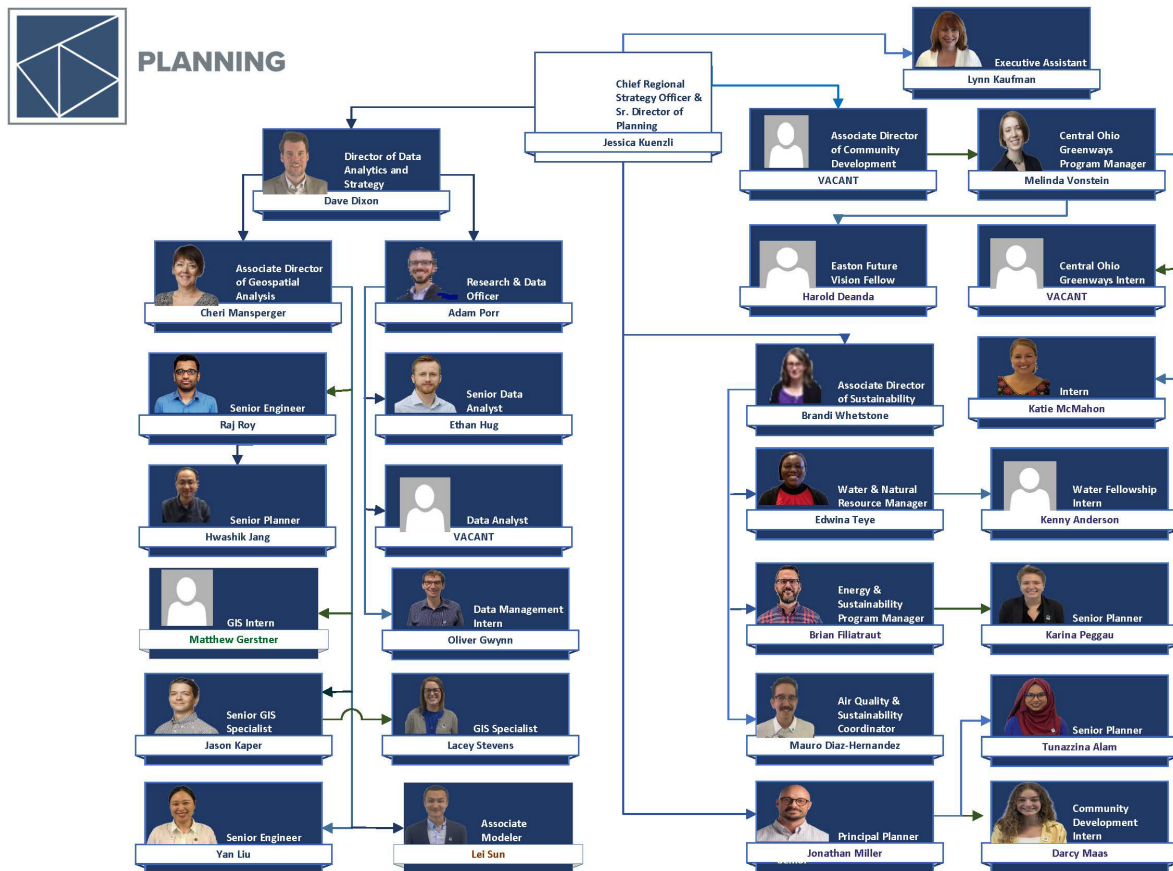
*Mid-Ohio Regional Planning Commission:*

MORPC will be responsible for implementing the Regional Engagement, Technical Assistance, and Capacity Building activity.

Key Management – Jessica Kuenzli, Chief Regional Planning Officer and Senior Director of Planning

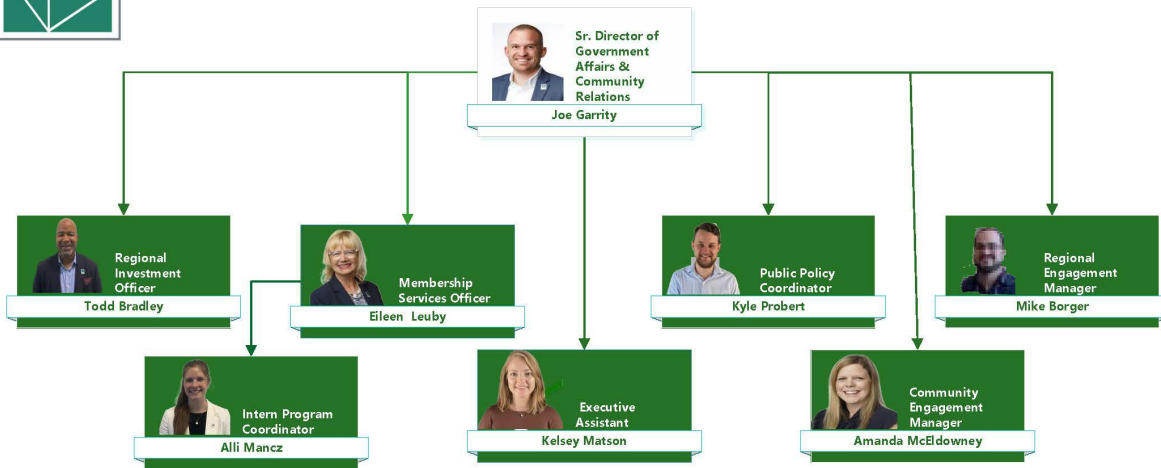
Full-time Staff –

- Mike Borger, Regional Engagement Manager
- Jonathan Miller, Principal Planner





## GOVERNMENT AFFAIRS



**EXHIBIT F  
LEVERAGE**

**CITY OF COLUMBUS, OH  
HUD PRO HOUSING GRANT APPLICATION**

DRAFT

## **Leverage**

Total leveraged funds from the City of Columbus to support PRO Housing activities total \$6,000,000 from the City of Columbus Affordable Housing Bond Fund to support land acquisition costs for the Enabling ETOD activity.

This amounts to a leverage commitment as a percent of grant funds requested of **86 percent**.

A Leverage Support Letter is included as an Attachment. Leveraged funds are also discussed in the Budget and Timeline section of Exhibit D, Soundness of Approach.

DRAFT

**EXHIBIT G  
LONG-TERM EFFECT**

**CITY OF COLUMBUS, OH  
HUD PRO HOUSING GRANT APPLICATION**

DRAFT

## Long-Term Effects

We know that property values rise around transit and mobility investments. Equitable Transit-Oriented Development (ETOD) is about housing, jobs, and services near transit so everyone has the opportunity to fairly and justly benefit. The proposed LinkUS mobility vision includes bus rapid transit (BRT) corridors that have the potential to become vibrant centers of activity that attract new development and reinvestment, all connected by high-quality transit. ETOD ensures that all residents benefit from this new investment – not just newcomers and higher-income residents, but residents who already live there or who might be historically disadvantaged from practices like redlining and underinvestment.

The benefit of ETOD as opposed to traditional growth is that Central Ohio can be intentional about who benefits from investments and how. We can help ensure that those who have the biggest need for better transit and new housing actually benefit from them, rather than being displaced by them. ETOD can help guide investment to areas where past wrongs can be righted. The anti-displacement measures that are a large part of our ETOD plan can help guide investment to where it's most needed and in ways that ensure that our longest-tenured residents – often those who lived through the disinvestment of yesterday – are the ones who benefit.

PRO Housing grant funds will better equip the City to address affordable housing challenges by decreasing barriers to affordable housing development on ETOD opportunity sites, promoting land availability, and increasing the capacity of suburban communities around Columbus to improve inclusionary land use regulations and housing policies. All activities will primarily benefit low-to-moderate income households.

The funding allocated for Enabling ETOD, coupled with leveraged local affordable housing bond funds, will result in an estimated 100 units of affordable housing. In sustaining this work beyond the PRO Housing period of performance to fulfill the ETOD Action Plan vision, there is potential to create more than 27,000 new housing units at ETOD opportunity sites, with a substantial portion set aside for low- to moderate-income households.

While the PRO Housing funding will result in tangible outcomes, the processes involved with program implementation will lay a framework to permanently strengthen our capacity and expand our toolkit to more adequately and holistically address our affordable housing challenges. The City will ensure that the proposed activities for PRO Housing funding will continue to expand access to housing opportunities for protected class groups, vulnerable populations, and low-to-moderate income households long after the period of performance ends.

The LinkUS vision and ETOD Action Plan will take decades to implement. The activities proposed in this PRO Housing application set the stage to prove the concept of ETOD at the outset of these initiatives and provide a new opportunity for the development community to learn ETOD strategies and best practices so that people of all incomes and abilities experience the benefits of new development near transit. As a result, the Central Ohio region will be better

positioned at the end of the PRO Housing period of performance to continue and accelerate this decades-long effort.

Central Ohio is growing, and it is growing fast. Now is the time to seize a generational opportunity to adopt equitable development regulations and supportive policies that will help direct growth and ensure that all residents are included in regional success. This PRO Housing grant application represents a unique opportunity to reimagine our current patterns of growth, help correct inequities created by past infrastructure investment and design, and invest in systems that support our regional most vulnerable residents – all of which will have long-lasting effects in Central Ohio.

MORPC will be a critical partner in expanding the impacts of these activities throughout the Central Ohio region. The pilot project and roadmap that they create for the City of Reynoldsburg is intended to be replicable for any community wishing to address their own barriers to the creation of affordable housing, and their success story will be a model for how other communities can use their dynamic toolkit as a resource to provide a wide variety of potential housing actions based on their geographic area. These tools will require agreement and partnerships amongst various municipalities and agencies within the LinkUS service area.

The Enabling ETOD activity represents a model for other communities as a pilot program that can be adapted for any community. This activity will demonstrate how communities can implement a multi-faceted approach to incentivizing and removing barriers to development on their most challenging sites. The tools that are developed are intended to grow with an be tailored to the respective station areas and the corridors on which they are aligned. Success will require targeted funding and financing tools to incentivize ETOD in strategic locations, develop multi-faceted revenue capture strategies, and other unique tools like New Market Tax Credits and Opportunity and Enterprise Zones, the combination of which will generate valuable lessons to share with communities nationwide.