



September 15, 2014

Mary Nichols, Chair  
California Air Resources Board  
1001 I Street  
Sacramento, CA 95814

**Re: Definition of “Benefit Disadvantaged Communities” for the AHSC Program**

Dear Chair Nichols and Members for the Air Resources Board (ARB):

Thank you for the opportunity to provide comments and participate in the stakeholder process on approaches to identifying disadvantaged communities and determining which projects benefit disadvantaged communities. CHC is a statewide housing advocacy organization representing the development, building, financial, and public sectors united in a non-partisan effort to produce and preserve housing affordable to Californians at all income levels. Our members have helped develop 248,000 affordable homes in California.

CalEPA’s “Approaches to Identifying Disadvantaged Communities” relies on information generated by the CalEnviroScreen, which uses environmental, health, and socioeconomic indicators. We believe that affordable housing investments best address some of these factors, such as reducing traffic density and poverty, but not necessarily pollution burdens. For that reason, the best housing sites for GHG reduction and their co-benefits may not be solely within DAC tracts. While we think it is essential that there be considerable investment within DACs, building affordable housing exclusively in DAC tracts may lead to housing not located near amenities such as transit, jobs, and services that allow for significant reduction in vehicle miles traveled and, conversely, may lead to housing located in close proximity to hazardous waste and in areas with poor air and water quality.

As such, it is important to recognize that housing built outside of DACs can still provide significant benefits to residents of DACs. In the ARB’s “Interim Guidance on Investments to Benefit Disadvantaged Communities,” several definitions were proposed to classify benefit to disadvantaged communities (DACs) for the AHSC program, including proximity to a disadvantaged

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community census tract or workforce outreach strategies to residents of disadvantaged communities.

We offer an additional definition for benefit to DACs: providing an occupancy preference for DAC residents in all affordable housing developments receiving AHSC funding across the state. An occupancy preference has the advantage of being easily documentable and providing tangible and long lasting benefits to residents of DACs.

An occupancy preference for residents of DACs addresses the tensions described above that are associated with linking benefit primarily to the geographic definition of a DAC. It also ensures that the AHSC program will comply with the U.S. Department of Housing and Urban Development and the California Department of Housing and Community Development's new policy goals of Affirmatively Furthering Fair Housing by creating access to communities of opportunity for low income households.

Lastly, we think it is essential that future definitions of DACs include rent burden and housing conditions.

Thank you for your consideration in this matter. Please do not hesitate to contact CHC's policy director, Marina Wiant, at (916) 930-5248 if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "Ray Pearl". The signature is written in a cursive, flowing style.

Ray Pearl  
Executive Director