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Planning/
Development Engineering
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Building
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Housing & Community
Investment
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Code Enforcement
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Port of West Sacramento
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Utility Billing
(916) 617-4589

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Administration
Finance
(916) 617-4575
Human Resources
(916) 617-4567

Parks & Recreation
Administration
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Recreation Center
(916) 617-4770
Community Center
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West Sacramento, CA 95605
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1951 South River Road
West Sacramento, CA 95691
(916) 617-4850

September 15, 2014

Air Resources Board

RE: Greenhouse Gas Reduction Fund
Investments to benefit Disadvantaged Communities

Dear Strategic Growth Council representative:

On behalf of the City of West Sacramento, I would like to thank you for the opportunity to comment on the Air Resources Board (ARB) definition of "Disadvantaged Communities" for the Greenhouse Gas Reduction Fund.

Census Tract designations

Census tracts are not synonymous with "communities". They may split a community in half, or may contain several small communities in less dense, rural areas. It would make sense to consider projects located in a zip code that contains all or a portion of a high ranking census tract as fulfilling the "investments to benefit Disadvantaged Communities" designation.

Targeting affordable housing to areas of high pollution

At least 50% of funds distributed through the Affordable Housing and Sustainable Communities (AHSC) program are to be spent on housing for lower-income households, and at least 50% is to benefit "Disadvantaged Communities". The regulations gives the Disadvantaged Community designation to census tracts that are highly impacted by both low-income socio/economic factors and pollution. But many census tracts that score highly on the combined scale are industrial areas that are not suited to housing development. They may lack schools, grocery stores, day care and other amenities that are required for a healthy, successful family life. Due to the pollution scores, these census tract, by definition, do not offer a healthy environment for vulnerable populations.

While rehabilitation of existing affordable housing in areas highly impacted by pollution may be beneficial, we strongly encourage new housing construction to be located in areas highly impacted by low-income socio/economic factors, but not by pollution factors. We recommend allowing the AHSC program to define benefit to a Disadvantaged Community, for the purposes of new housing construction, as a zip code that contains all or a portion of a high ranking census tract located within it. Or as an alternative, new housing built within a 2 mile radius of a Disadvantaged Community census tract. This will allow housing

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developers a wider range of available sites so that the most suitable can be selected for affordable housing projects.

Please contact me at (916) 617-4555 if you have any questions regarding the comments above.

Sincerely,



Louise Collis
Senior Program Manager

cc: California Department of Housing and Community Development