



CITY OF EMERYVILLE

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September 12, 2014

Mr. Matthew Rodriquez, Secretary
California Environmental Protection Agency
1001 I Street
P.O. Box 2815
Sacramento, CA 95812-2815

RE: Comments from the City of Emeryville regarding the allocation of Cap and Trade funds and the impact on disadvantaged communities

Dear Secretary Rodriquez:

On behalf of the City of Emeryville, I thank you and your agency for its efforts to address how to effectively allocate Cap and Trade revenue, and would like to provide some recommendations.

The City of Emeryville has a rich history of supporting policy initiatives that strengthen efforts to mitigate climate change. This includes, but is not limited to, encouraging transit oriented development and infill housing, providing free transit within the city and to/from BART, supporting efforts to improve public health and environmental quality, cleaning up brownfields and turning them into productive sites, and supporting affordable housing.

As the California Environmental Protection Agency moves forward with the CalEnviroScreen (CES) version 2.0, we are alarmed that the formulas used may not support our efforts to provide services to disadvantaged communities in Emeryville and the entire East Bay region. We observe that CES 2.0 overlooks a large number of urban communities that are some of the most polluted and disadvantaged in the State and the neighborhoods that surround them.

Key facts:

- Nearly 15 percent of Emeryville's housing stock is below market rate and income restricted. By tenure type, 16.5 percent of Emeryville's rental housing and 11.7 percent of its ownership housing are price and income restricted.
- Over 3,300 households have expressed interest in the affordable units in two rental housing projects currently under construction in Emeryville. Among the households that asked for notification of available affordable housing units, 85 percent live outside Emeryville and 34 percent live in Oakland. There are only 50 affordable units in these projects, so a maximum of 1.5 percent of those who have expressed interest can be housed.
- Emeryville's Ambassador Housing project opened this year with 69 units of housing restricted to households earning 30% to 50% of the Area Median Income. There were over 1,350 qualified applicant households, most of which moved from outside of Emeryville.

The City of Emeryville respectfully recommends the inclusion of criteria regarding projects adjacent to disadvantaged census tracts or a priority focus for projects in the same ZIP code that serve disadvantaged neighborhoods. This change would significantly help disaggregate poverty while serving the most impoverished in the East Bay. For example, Emeryville shares a border with Oakland and the West Oakland neighborhoods. The 94607 ZIP code, just south of Emeryville in West Oakland, and the 94608 ZIP code, encompassing both cities, have many high risks factors, such as poverty, poor air quality, and unemployment. However, the adjacent Emeryville census tract does not account for many of those residents needing services offered in Emeryville.

According to CES 2.0, less than 3% of Bay Area residents live in disadvantaged communities, which is not supported by other data sources, missing the mark in assisting our most at-risk communities. For example, as described in the report, "Life and Death from Unnatural Causes", the Alameda County Health Department (ACHD) reports that, "the rate of emergency department visits for asthma countywide among school age children (5 – 17 years of age) is 661.1 per 100,000. This rate increases by two to three fold in West Oakland, North Oakland, and Emeryville. These areas have large African American populations and many low income residents living in the midst of major sources of air pollution and bearing a disproportionate burden of illness" (page 93 of the ACHD report).

Given these facts, we request that the following steps be taken to avoid CES 2.0 unfairly impacting Bay Area disadvantaged communities:

1. CES 2.0 not be used for funding allocations until flaws identified by regional agencies have been corrected.
2. Funds be initially apportioned by regional populations and then allocated within the region by equitable tools to delineated disadvantaged communities and adjacent communities serving them.
3. A new public workshop be held later in September or October incorporating discussion of alternatives to CES 2.0.

On behalf of the City of Emeryville I thank you for your efforts. If you need additional information or data from us, please do not hesitate to contact Amber Evans, Community and Economic Development Coordinator, at 510-596-4382 or aevans@emeryville.org.

Sincerely,


fa Sabrina Landreth
City Manager

cc: Emeryville City Council
Senator Loni Hancock
Assembly Member Nancy Skinner
Mary Nichols, Air Resources Board Chair