Disadvantaged Communities (DAC) Comments

Submitted by Domus Development, LLC

9/15/14

**DAC Definition**

**Proportion of DAC**

**Proposal**: Draft criteria call for counting only census tracts that score in the highest 25% of Disadvantaged Communities (DACs).

**Comments**: Allow a scoring mechanism that weighs CalEnviroscreen 2.0 scores with other factors. For example, scores of 91-100% receive 10 points, 81-90% receive 9 points, 71-80% receive 8 points, 61-70% receive 7 points, and 51-60% receive 6 points. Additional points could be made up allowing for scoring using the following types of considerations:

1. *Remediated environmental contamination*: Many jurisdictions and developers have worked to finance and complete the remediation of brownfields and otherwise contaminated sites. Allowing scoring that reflects these efforts will support projects that have been underway in highly contaminated areas that may not score as high as they once did under CalEnviroscreen due to significant long-term remediation efforts.
2. *Adaptive reuse neighborhoods*: Projects that previously served as former military bases, railyards, ports, industrial sites, and otherwise non-residential uses can be ideal locations for developing communities that contribute to the reduction of GHGs. They are often transit-rich, provide employment opportunities, and score high in environmental measures on Cal Enviroscreen. However, their proportionally low populations often reduce the health portion of the score of these otherwise high-scoring areas. Allow scoring that reflects an acknowledgement of this.
3. *Master*-*planned transit areas*: Awarding projects that are located in areas with master-planned transit areas will absolutely contribute to the reduction of GHGs. Areas that fit this description could include City-led transit hub planning and MPO Priority Development Areas.

**Rural Designation**

**Proposal**: Draft criteria do not currently include a rural set-aside.

**Comments**: Urbanized rural areas serve as the hub of transportation, services, and amenities for large areas, often entire counties. These areas also include contributors to GHG emissions through long commutes for basic services and amenities. A rural designation would encourage smart-growth land use patterns in rural areas, locating residents close to amenities like grocery stores and health clinics, thereby reducing VMTs and GHGs and increasing health outcomes. The rural designation definition should match the California Tax Credit Allocation Committee.

**Appendix 1-2: AHSC Draft Criteria to Evaluate Projects**

**Step 1: Location**

1. **Proposal**: Draft criteria call for avoiding displacement of DAC residents.

**Comments**: Specify that construction of affordable housing in a DAC would not count as displacement.

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**Comments**: State this in the affirmative. Create additional scoring or other considerations for projects that include a plan for reaching out DAC residents and businesses and/or prioritizing them for residence or leasing opportunities in the new development.

**Step 2: Benefit**

1. **Proposal**: Draft criteria call for including projects within ½ mile of a DAC that reduces VMTs and avoids displacement.

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1. **Proposal**: Draft criteria call for including projects within ½ mile of a DAC that reduces VMTs and avoids displacement.

**Comments**: Define parameters for reducing VMTs, including projects in close proximity to transit and amenities.

1. **Proposal**: Draft criteria call for including work performed by DAC residents.

**Comments**: This could be challenging to track and administer. We recommend modifying this to a demonstrated partnership, (e.g. MOU), with a local welfare-to-work program or equivalent.

1. **Proposal**: Draft criteria call for including at least 25% of the work performed by DAC residents.

**Comments**: It will be difficult to commit to this prior to the award of construction contracts. We recommend removing the minimum percent and replacing the verbiage with alternatives such as an MOU with a local welfare-to-work program.

1. **Proposal**: Draft criteria call for including at least 10% of the work performed by DAC residents in job training programs.

**Comments**: It will be difficult to commit to this prior to the award of construction contracts. We recommend removing the minimum percent and replacing the verbiage with a demonstrated partnership with job training programs or general contractors or subcontractors that participate in qualifying programs.