



Tahoe Metropolitan Planning Organization

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September 15, 2014

Matthew Rodriguez, Secretary for Environmental Protection
California Environmental Protection Agency
P.O. Box 2815
Sacramento, CA 95812-2815

Re: Approaches to Identifying Disadvantaged Communities

Dear Mr. Rodriguez,

Thank you for the opportunity to comment on the California Environmental Protection Agency's "Approaches to Identifying Disadvantaged Communities" and the CalEnviroScreen 2.0 tool.

The Tahoe Metropolitan Planning Organization works closely with local jurisdictions, and state and federal partners within the Lake Tahoe Region to implement a sustainable, multi-modal transportation system that supports walkable, mixed-use town centers that help reduce greenhouse gas emissions and protect the environment and clarity of Lake Tahoe. In 2012 we approved our first Sustainable Communities Strategy and are working towards greenhouse gas reduction targets of 7% and 5% per capita by 2020 and 2035, respectively. To meet this level of greenhouse gas reduction, as well as other environmental targets set by the Bi-State Compact, significant levels of investment in community revitalization, and particularly multi-family, affordable housing in town centers is needed. We are excited about the opportunities presented by the Cap and Trade auction proceeds, particularly those directed towards the Affordable Housing and Sustainable Communities (AHSC) Program and hope that we will have the maximum ability to apply for these funds.

We have reviewed CalEPA's "Approaches to Identifying Disadvantaged Communities" and appreciate the significant amount of work that went into preparing the different proposed methodologies. We would like to recommend that CalEPA adopt a broad definition of "disadvantaged" communities. The five methodologies provided currently in the "Approaches to Identifying Disadvantaged Communities" allow a very narrow range of communities to qualify as Disadvantaged, and primarily focus on a methodology that requires communities to have high scores in both the Population Characteristics and Pollution Characteristics. TMPO recommends a system that allows communities to qualify based on a high score in *either* the Population Characteristics, or the Pollution Characteristics, or both. This will still be in compliance with SB 535 as both categories will be eligible for the grant funding and grant evaluators can ensure that projects in both of these categories are awarded funds.

In addition, we recommend that CalEPA expand the options for defining disadvantaged communities beyond CalEnviroScreen and consider other common definitions such as free and reduced lunch or the need for affordable housing as criteria. Broadening the definition of disadvantaged communities will allow grant evaluators to ensure that they are able to choose the best projects that maximize greenhouse gas reductions to the state and provide the most benefits to disadvantaged communities. By requiring that 25% of the Cap and Trade auction revenues, and in the case of the AHSC program, 50%

of the funds go to disadvantaged communities fitting a very narrow definition, grantors will be locked in to quotas and will not have the flexibility to fund the best projects. Broadening the definition allows grant administrators to direct funds to the best projects that also provide the most benefit to the most disadvantaged communities, both socioeconomically and those that bear high pollution effects, while allowing freedom to fund other strong projects.

While we are supportive of the idea that Cap and Trade auction revenues should go to communities that are most impacted by pollution, we also have a concern that socio-economically disadvantaged communities in small rural communities will have few options for funding to meet state-mandated goals of SB 375. Small rural communities receive very low amounts of formula funding based on our small populations; however in many cases our communities serve as the playground of larger urban areas and are expected to provide infrastructure and services for visitor populations many times the number of our local populations. This further impacts our low-income populations by stretching already minimal resources.

While many may perceive Lake Tahoe to be a wealthy location of lakefront homes and leisure resorts, there are significant poverty and housing affordability issues in our communities facing our large working class. In the Lake Tahoe Unified School District, for instance, over 60 percent of the students are eligible for free and reduced lunch. In some individual schools this number is as high as 75 or 80 percent. Between 2006 and 2010, forty percent of households in the Tahoe Region were classified as low-income (80 percent or less of median income). In addition, Lake Tahoe's labor force faces a high housing cost burden due to high rents and high median home prices. Among households of all incomes in the Tahoe Region, between 2006 and 2010, roughly 45 percent had housing cost burdens greater than 30 percent of income, and the need for affordable housing units exceeded 9,800 units, which equates to about 25% of the existing housing stock.

Rural areas, particularly those with a high recreational draw, are an extension of metropolitan areas, and cannot address land use and transportation needs without the proper attention and funding. By making our rural areas a better destination for urban visitors, we simultaneously support our vulnerable populations while providing healthy, well-designed communities where visitors do not need a car to get around. Supporting good development in rural areas will allow good development in urban areas to be successful.

Thank you for your consideration of our request for a broad definition of disadvantaged communities that allows for maximum benefit both in greenhouse gas reductions and to disadvantaged communities, while allowing all communities in the state, including rural areas, to have the maximum opportunity to apply for Cap and Trade auction proceeds.

Sincerely,



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Principal Transportation Planner

Cc:

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John Hester, TRPA

Carl Hasty, Tahoe Transportation District

References:

-California Department of Education, Free and Reduced Price Meal Data, October 2013 Data Collection

-Tahoe Regional Housing Needs Program Report, Needs Assessment Background Report and Priority Policy and Program Evaluation, BAE Economics, Tahoe Regional Planning Agency, May 28, 2014