Comments to CalEnviroScreen 3.0

Motoyama, Lisa (MYR) [lisa.motoyama@sfgov.org]
Sent: Friday, October 21, 2016 4:46 PM
To: CalEnviroScreen, CalEnviroScreen@OEHHA
Cc: Hayward, Sophie (MYR) [sophie.hayward@sfgov.org]; Dayton, Andrew (MYR) [andrew.dayton@sfgov.org]

Dear Ms. Flowers:

We are writing to thank the OEHHA for the change in the poverty metric from twice the federal poverty level to rent adjusted income. We feel that this change better captures the differences in the cost of living across the state and is a more equitable measure for high cost areas such as San Francisco.

However, regarding the use of the CalEnviroScreen for the Affordable Housing and Sustainable Communities program, we continue to be concerned by the use of a metric that uses negative location based pollution and environmental hazards combined with negative health and socioeconomic outcomes to give preference for funding for affordable housing developments. We understand that this ties back to environmental justice goals through equitable investment in the most impacted communities. Unfortunately, for affordable housing development specifically, it is counter to the direction that the state's most important funding program, the Low Income Housing Tax Credit program through the California Tax Credit Allocation Committee (CTCAC), is taking. Please find below an excerpt of their discussion on opportunity communities:

There is currently a national discussion of how tax credit programs can best provide educational, economic, and social opportunity for tenants. Staff endorses this important objective and believes that California, while its 9% program has started down this path by considering proximity to various site amenities, can do more. In that vein, staff proposes to generally prohibit new construction, large-family, competitive tax credit projects in areas of low-opportunity unless the project is part of a concerted community revitalization program involving the local government and significant investment outside of the project. The prohibition would not apply to rehabilitation projects, to non-family projects, or to non-competitive (4% federal credits only) projects. Given that competitive credits are limited and over-subscribed, staff believes that it should focus its resources for large family projects in areas that will provide adequate opportunity for both working adults and children. That said, staff believes that it is appropriate to support family projects in low-opportunity areas that are part of a larger, coordinated, community revitalization effort. Comprehensively improving disadvantaged
communities is also an important goal. Staff encourages suggestions on how to define a low-opportunity area but is leaning towards using UC Davis' Regional Opportunity Index for Place (not People), which integrates various economic, infrastructure, environmental, and social indicators into a comprehensive assessment of the factors driving opportunity. While no index is perfect, staff has consulted with HCD and believes that this is the best resource available at this time. (Proposed Regulations Changes with Initial Statement of Reasons, September 15, 2016, CTCAC)

We hope that the OEHHA together with the Strategic Growth Council (SGC) can work together to help align the SGC's funding efforts, solely for affordable housing development, with the direction of CTCAC since affordable housing financing is entirely dependent upon leveraging funding from multiple sources, most importantly the Low Income Housing Tax Credit program as administered by the CTCAC and focus on high opportunity locations.

Thank you for your consideration.

Sincerely,

Lisa Motoyama
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