



CALIFORNIA RURAL LEGAL ASSISTANCE FOUNDATION
Advocates for Justice



CALIFORNIA COALITION FOR RURAL HOUSING



October 31, 2018

California Tax Credit Allocation Committee
915 Capitol Mall, Room 485
Sacramento, CA 95814

Re: Opportunity Maps, Published for Comment by CTCAC

Dear Director Stivers,

On behalf of the Rural Smart Growth Task Force, we would like to thank you for the opportunity to provide feedback and comments on the newest Opportunity Maps and Mapping Methodology.

We commend the state's overall effort to address and rectify the state's role in creating true housing choice in order to address historically and ongoing patterns of segregation and to ensure that all communities' need for affordable housing is met. We appreciate the state's partnership in exploring how to meet these shared fair housing goals in a way that accounts for California's unique communities and which does not inadvertently deprive communities of direly needed investment.

Specifically, we are grateful that some of our members were able to join in the Rural Working Group to partner with the Fair Housing Task Force to explore how better to assess opportunity in rural California communities. This partnership was successful in creating critical changes to the methodology that has resulted in more nuanced maps. Working with the Fair Housing Task Force and with representatives from CTCAC over the past year has been a positive experience, and their commitment to rural communities has been evident.

Siloed Solution to Housing Choice and Fair Housing



Incentivizing affordable housing development in select high opportunity neighborhoods alone without analyzing and addressing barriers to fair housing choice and opportunity holistically will not achieve the outcomes we desire and envision

Recommendation: *As we have in the past, we encourage TCAC to integrate its efforts to create the Opportunity Maps into a broader multi-agency, multi-stakeholder dialogue that examines that numerous barriers to affordable housing development and access to opportunity in both high and low resource, rural and urban, and coastal and inland areas.*

Ongoing Engagement with the Rural Working Group

The partnership between the Fair Housing Task Force charged with developing the maps and the Rural Working Group was critical. Through conversations during this partnership, it was clear that understanding of the rural context and potential application of these maps was not sufficient among the core members of the Task Force. As California moves forward with the use and continued improvement of these maps, this rural expertise is still very much needed.

Recommendation: *The Rural Working Group should continue to meet with core members of the Fair Housing Task Force each year to ensure that updates to the maps are informed by rural expertise and equitable to rural communities.*

Census Tracts

The challenges in accessing consistent data below the Census Tract level are well-documented and understood, however we again stress that a fundamental flaw with these maps is that rural communities are disproportionately located within very large census tracts (some the size of Rhode Island). We are grateful that the use of census tracts and their appropriateness for rural areas were revisited and that the new methodology excludes census tracts where the population density is lower than 15 people or five households per square mile and census tracts where prisoners make up at least 75% of the population. While an improvement, these changes helped to eliminate false areas of opportunity, but did not address the core issues. While census tracts can often serve as a proxy for neighborhoods in more urban areas, one census tract in a rural area may encompass numerous jurisdictions. This results in no assessment of the distinction between areas of opportunity across these communities, let alone



within them. The methodology document perpetuates this concern with its continued reference to “neighborhoods” when discussing assessment of census tracts.

Recommendation: *Rural areas of the state should not be assessed at the census tract level, and additional accommodations should be made at every possible opportunity to better account for rural communities.*

Racial Segregation and Concentration of Poverty

The use of census tracts has one of the greatest impacts in the application of the filters. Comparing the racial composition or poverty level of one neighborhood to another within a community is at the center of Affirmatively Furthering Fair Housing and Housing Choice efforts and the use of census tracts in urban areas is appropriate. However, as discussed above, in rural areas these maps are comparing the racial composition and level of poverty across entire swaths of the state. This has resulted in a disproportionate number of rural jurisdictions immediately eliminated from qualifying as high or highest opportunity.

Recommendation: *Remove the use of the Racial Segregation and Poverty as a filter for rural communities, as other indicators already account for these factors.*

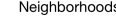
Topographical Considerations

Although improvements have been made by taking into account areas with low population density and census tracts where the majority of the population is within a prison, topographical challenges and undevelopable land are not assessed in these maps. Often, the highest areas of opportunity in rural communities have been identified in forest land, along the coast, or in mountainous regions that are -- for all intents and purposes -- undevelopable.

Recommendation: *The Opportunity Maps should include a layer documenting and assessing the topography of rural areas.*

Infrastructure

Closely related to the topographical issues, are concerns relating to infrastructure. While infrastructure is often a challenge in rural development, any of the only high or highest opportunities in rural communities across the state are not only physically impossible to build upon, but are far removed from



any existing infrastructure — specifically water — further rendering these locations as nearly impossible to build upon.

Recommendation: *Maps should include a layer that takes into account or maps existing — or even planned — water infrastructure.*

Gentrification

Although we understand that efforts to assess gentrification are underway, it is concerning that the current maps do not account for rapidly gentrifying areas that may become high resource neighborhoods.

Recommendation: *The maps should use the change in housing prices as a proxy or indicator of rapidly changing/gentrifying communities.*

While the maps are greatly improved, and while the established partnership of the Rural Working Group and the California Fair Housing Task Force has been successful, it is pertinent that these efforts continue. We understand that the intent is to use these maps to provide an incremental incentive for the development of affordable housing into areas of higher opportunity. We will save detailed comments on the implementation of these maps for the response to the proposed regulations, but rural and farmworker communities stand to lose the most if the State does not create a process that is equitable to all regions. This not a question of having a perfect tool, it is a question of having a fair, equitable and useful tool. We have been here before in attempting to assess programs without rural set-asides, with insufficient data on rural communities, or with processes that seemed too burdensome to put into place. Each time rural, farmworker, and American Indian communities have lost necessary resources and time and often have fallen further behind our urban counterparts. The Rural Smart Growth Task Force appreciates the opportunity to comment and to find ways to promote equity and opportunity in all of California's communities.



Sincerely,

The Rural Smart Growth Task Force

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