



Measure AA Guidelines
Definition for “Economically Disadvantaged Communities”
May 4th, 2017

Background:

Participation by the Bay Area’s low-income communities of color are crucial to meeting Measure AA’s aspirational wetland restoration goals; but without resources, the ability of these communities to make needed changes and meet regionwide targets is compromised. These traditionally underserved communities have not had the advantages of long-term capacity building, resulting in their inability to effectively compete for unrestricted planning and implementation funding. We appreciate the San Francisco Bay Restoration Authority’s (SFBRA) interest in addressing this issue by inviting Environmental Justice community leaders to provide an accurate and equitable definition for the term used in the guidelines document, “Economically Disadvantaged Communities” (EDC). We strongly suggest SFBRA include the below definition in Measure AA’s Guidelines document in its entirety, in order to ensure priority is given to projects that benefit communities with a history of environmental injustice that have suffered the disproportionate burdens of environmental hazards.

The Environmental Justice Coalition for Water (EJCW), The Resilient Communities Initiative (RCI), Asian Pacific Environmental Network (APEN), Midpeninsula Regional Open Space District, and a list of our coalition partners strongly recommend using a narrower approach to identifying EDCs, rather than making a single definition meet all needs (WAT 79505.5¹). A regionwide program of this magnitude must be made to work in the context of the Bay Area’s geographic, economic, and resource diversity. The absence of a sufficiently granular definition frustrates the identification of where DAC neighborhoods are located. This phenomenon is particularly pronounced in the Bay Area, due to the higher cost of living and the use of eligibility thresholds for incomes relative to Bay Area-wide or state averages. The proposed definition therefore references Area Median Income (AMI) as a preferred income identification tool, which attempts to recognize to a greater degree the economic segregation of the Bay Area. It is also congruous with other income-based issue areas like housing.

Additionally, through our role as IRWM DAC Involvement Program Manager, EJCW is working with statewide partners to address this issue by developing longer-term maps

¹ <http://codes.findlaw.com/ca/water-code/wat-sect-79505-5.html>



of communities facing disadvantages, and believe the Measure AA process of understanding where disadvantaged communities exist should be developed in tandem with our Proposition 1-funded efforts. Thus, we believe the proposed definition for “Economically Disadvantaged Communities” should be considered an interim definition, with a shared understanding of the cumulative effects of socioeconomic and environmental burdens not currently included by the California DWR DAC definition; “a community with a median household income less than 80% of the state-wide average.”

Rationale for “Economic Disadvantage” indicators to be considered include, but are not limited to:

- History/Legacy of Racial Discrimination (i.e. segregation in housing, schools, and other civic institutions, land use siting and other practices, lower access to opportunity in the form of well-paid jobs, quality education, affordable health care, transportation, housing, reliable infrastructure, healthy food options (especially fresh fruits and vegetables), parks, etc.
- Displacement-Risk Factors (i.e. measured by eviction rates, foreclosure rates, or loss of historic housing stock and/or naturally affordable units)²
 - Housing affordability is an important part of the framework of social and economic conditions that shape the health and well-being of individuals³
 - People with low incomes and people of color are currently most affected by displacement.⁴
- Disproportionate Environmental Burdens on air, soil, water, and infrastructure by heavy industrial use.⁵
 - A growing body of literature provides evidence of the heightened vulnerability of people of color and lower socioeconomic status to environmental pollutants.⁶
- Climate vulnerability (i.e. car ownership, elderly living alone, impervious surface, projected climate impacts)⁷

² See Table 1 (pg. 6) on Indicators and Data Sources for Analyzing Gentrification and Displacement in Chapple, Karen, and Miriam Zuk. “Forewarned: The Use of Neighborhood Early Warning Systems for Gentrification and Displacement.” *Cityscape: A Journal of Policy Development and Research* 18.3 (2016).

³ Ibid.

⁴ Pollack, S., B. Bluestone, and C. Billingham. “Maintaining Diversity in America’s Transit-Rich Neighborhoods: Tools for Equitable Neighborhood Change New England Community Developments (Vol. Issue 1).” *Boston, Mass.: Federal Reserve Bank of Boston* (2010)

⁵ See CalEnviroScreen 3.0 Report on Pollution Burden.

<https://oehha.ca.gov/media/downloads/calenviroscreen/report/ces3report.pdf>

⁶ Ibid.

⁷ See Table 4 (pg. 17) of Update and Statewide Expansion of the Environmental Justice Screening Method (EJSM) published by California Air Resources Board. May 2016. <https://www.arb.ca.gov/research/apr/past/11-336.pdf>



- o Research indicates that climate change is having a disproportionate impact on the health of poor communities and communities of color in the US.⁸
- Housing-Burdened Low-Income Households: percent of low-income households (making less than 80% HUD Area Median Family Income) and paying more than 50% of income on rent and utilities⁹
 - o Households that experience high rent burden for longer periods of time are associated with greater disadvantage. High housing cost burdens and unaffordable housing situations can also contribute to residential instability, increase vulnerability to acute and chronic health problems, worsen stress and depression, and can lead to poor educational outcomes for children.¹⁰
- Linguistic Isolation (Limited English-speaking households)¹¹
 - o Lack of proficiency in English often results in racial discrimination, and both language difficulties and discrimination are associated with stress, low socioeconomic status, and reduced quality of life.¹²

Proposed Definition: Economically Disadvantaged Communities (EDC)

A community (census tract) with a median household income less than 80% of the area median income (AMI). Within this set of low-income communities, high priority EDCs are further defined as groups that are historically underrepresented in environmental policymaking and/or projects, most economically and environmentally impacted by heavy industrial activity and development, vulnerable to climate change impacts, due to lack of resources required for community resilience, and severely burdened by household costs, at risk of displacement.

⁸ Ibid.

⁹ Available from Comprehensive Housing Affordability Strategy Data from Department of Housing and Urban Development user website. <https://www.huduser.gov/portal/datasets/cp.html#2006-2013>

¹⁰ See pg. 128 of CalEnviroScreen 3.0 Report on Housing Burden.

<https://oehha.ca.gov/media/downloads/calenviroscreen/report/ces3report.pdf>

¹¹ See pg. 132-133 of CalEnviroScreen 3.0 Report on Linguistic Isolation.

<https://oehha.ca.gov/media/downloads/calenviroscreen/report/ces3report.pdf>

¹² Ibid.