

Attachment 7: **Disadvantaged Community**



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Introduction:

Figure 2 shows the boundaries of the MWA service area and the area within these boundaries designated by CalEnviroScreen 2.0 to have a score of 76 percent or higher, satisfying the DAC requirements as specified by the PSP. Figure 3 is a map that also displays the MWA service area boundaries and applies DWR's standard methodology for delineating disadvantaged communities used in previous IRWM grant applications submitted by the Agency. This map designates disadvantaged communities as census tracts having a median household income of less than 80 percent of the 2010 State-wide average.

As described in Attachment 3 and other locations in this grant application, the MWA Turf Replacement Conservation Incentive Program is targeted primarily at residential water users with eligibility extended to residences located throughout the Agency's service area. Comparison of Figure 2 and Figure 3 illustrates that restricting program eligibility to the census tracts defined as being disadvantaged by CalEnviroScreen 2.0 would cause the MWA to exclude a substantial percentage of the economically-disadvantaged households within its service area from Program eligibility, a step that would be a significant departure from the eligibility requirements applied to other water conservation programs administered by the MWA.

Conformance with AB 1532 Goals and SB 535 Requirements:

In spite of the discrepancies between the census tracts identified as disadvantaged using CalEnviroScreen 2.0, a process that identifies disadvantaged communities by assessing all "census tracts in the State to identify areas disproportionately affected by multiple types of pollution and areas with vulnerable populations"¹, and those identified based on median household income, a high proportion of the benefits of the Turf Replacement Conservation Incentive Program will be directed to low-income households, and, as such, the Program conforms with many of the goals of AB 1532 (California Global Warming Solution Act: Greenhouse Gas Reduction Account) and the requirements of SB 535 (California Global Warming Solutions Act of 2006: Greenhouse Gas Reduction Fund). In particular, the Program contributes to the legislative objectives to:

- Reduce GHG emissions: As described in Attachment 2, the Program is estimated to reduce GHG emissions by 422,609 kg CO₂e per year after full implementation.

¹ <http://www.arb.ca.gov/cc/capandtrade/autonproceeds/workshops/arb-sb-535-interim-guidance-08-22-2014.pdf>

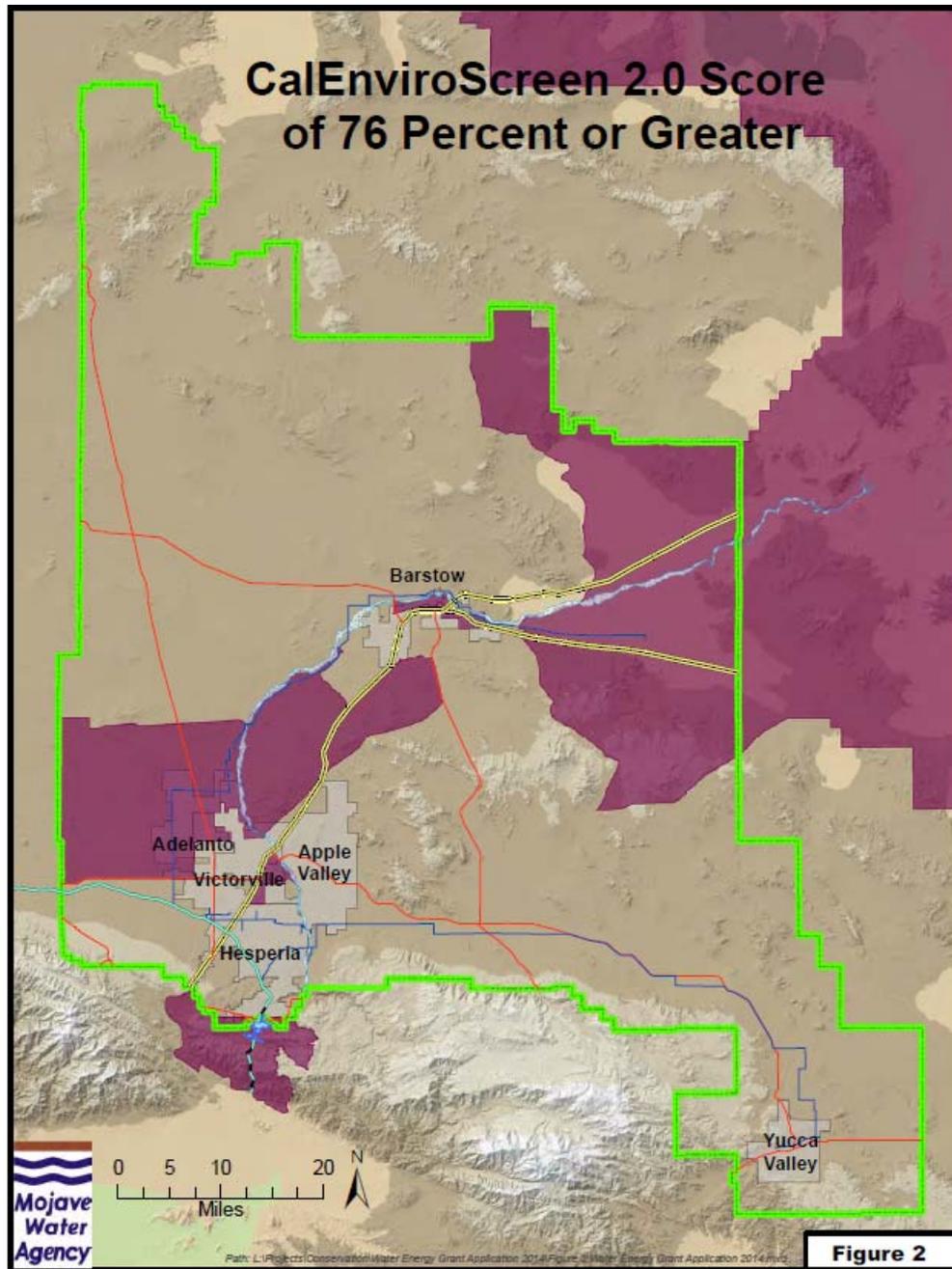


Figure 2: CalEnviroScreen Designation of Disadvantaged Areas.

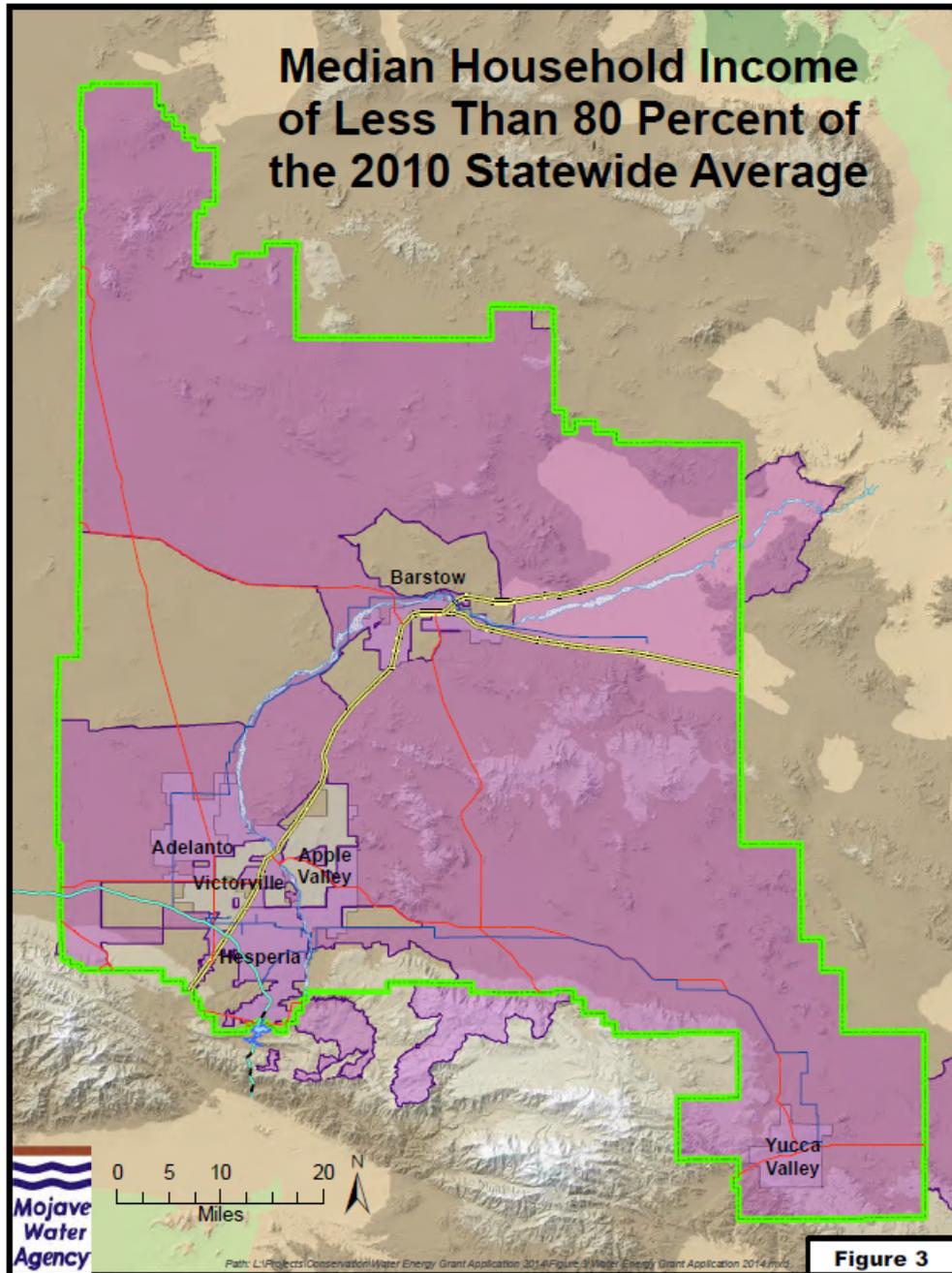


Figure 3: Designation of Disadvantaged Communities based on household incomes.

- Maximize economic, environmental, and public health benefits to the State: Reductions in GHG emissions due to Program implementation will result in public health benefits to the State as well as contributing to the State-wide response to climate change.

- Foster job creation by promoting in-State GHG emission reduction projects carried out by California workers and businesses: All State funds requested in this proposal will be used to provide rebates for projects that will replace turf grass with low water use landscaping. Therefore, state funds will go directly to projects that reduce water use through turf removal and that replace turf with desert adaptive and/or drought tolerant plants. In addition, as the Program budget indicates, all grant funds being requested will support Construction/ Implementation activities to be performed by local workers and businesses. Therefore, the state investment in the Program will be concentrated exclusively within the local economy with administrative costs being borne by the MWA.
- Direct investment toward the most disadvantaged communities and households in the State: As noted in the preceding bullet, local workers will implement the turf removal and landscape replacement projects. Given the nature of the work to be performed and the demographics of the region, it is likely that a high proportion of the workforce engaged in these activities will be disadvantaged. In addition, the increase in the rebate level from \$0.50 to \$1.00 per square foot of turf replaced is designed to boost the rate of program participation among low-income households. As a result of this change, a higher proportion of the long-term benefits of the Program are also likely to accrue to low-income households with these benefits coming in the form of reduced utility bills.

Summary of benefits to disadvantaged communities

Given the success of earlier phases of the MWA's Cash for Grass Program and the low-household incomes characteristic of the MWA service area, it is likely that a high proportion of participants in the MWA Turf Replacement Conservation Incentive Program will be economically-disadvantaged households. The Agency is encouraging the participation of low income households by doubling the rebate rate and expects the Program to further benefit disadvantaged households through the employment opportunities generated for local workers to engage in project implementation. In short, State funds administered through the Program would provide direct, meaningful, and assured benefits in meeting GHG reductions, supporting disadvantaged communities through employment opportunities and by providing long-term economic assistance through reduced water bills and subsidized improvements to landscapes.

As noted in the guidelines for approval for turf replacement projects, new landscaping designs are reviewed by local water purveyors to ensure that the new landscapes do not compromise air quality and are designed to control storm water runoff. Completed landscapes are then inspected to confirm that they satisfy these objectives.