

CALIFORNIA TAX CREDIT ALLOCATION COMMITTEE
Minutes of the December 12, 2018 Meeting

1. Roll Call.

Steve Juarez for State Treasurer John Chiang chaired the meeting of the California Tax Credit Allocation Committee (CTCAC). Mr. Juarez called the meeting to order at 11:40am. Also present: Alan LoFaso for State Controller Betty Yee; Jacqueline Wong-Hernandez for Department of Finance (DOF) Director Keely Martin Bosler, Lisa Bates for California Department of Housing and Community Development (HCD) Director Ben Metcalf and County Representative Santos Kreimann.

California Housing Finance Agency Executive Director Tia Boatman-Patterson and City Representative Ray Mueller were absent.

2. Approval of the Minutes of the November 14, 2018 Meeting.

MOTION: Ms. Wong-Hernandez moved the approval of the Meeting Minutes. Mr. LoFaso seconded and the motion passed unanimously by a roll call vote.

3. Executive Director's Report.

Executive Director Mark Stivers stated CTCAC financed 15,760 units with 4% Low-Income Housing Tax Credits (LIHTCs) this year which is the third highest on record and very close to the second highest on record. He noted that 2016 was significantly higher. Mr. Stivers also stated CTCAC financed 4,293 units with 9% LIHTCs which is up about eight percent from last year but is a continuation of a long term downward trend as projects are seeking more credit per unit. Mr. Stivers noted tax credit pricing has decreased recently due to the less availability of other public sources and a higher need for more tax credits to fill gaps.

Mr. Stivers also reported on projects that were skipped in the 9% competition. He stated in the first round, two projects were skipped in the Rural set aside the Senior housing type goal had been met in that set aside and one project was skipped in the Balance of Los Angeles County region because the Special Needs housing type goal had been met. In the second round, two projects were skipped in the Rural set aside because of the Rehabilitation housing type. While CTCAC remained in line with the housing type goals but did not meet any of the remaining housing type goals stated in the regulations.

Mr. LoFaso thanked Mr. Stivers on his due diligence for reporting the skipped projects and asked Mr. Stivers if he thinks the results indicate that the goals are meeting their purposes.

Mr. Stivers stated that the goal is to distribute LIHTCs to various types of projects. Mr. Stivers reaffirmed that staff is achieving its goal and the current housing type goals are fairly appropriate. Mr. Stivers did not suggest any changes.

Mr. LoFaso thanked Mr. Stivers and stated his answer was substantive.

4. Discussion and Consideration of the 2018 Applications for Reservation of Federal Four Percent (4%) LIHTCs for Tax-Exempt Bond Financed Projects.

Development Section Chief, Gina Ferguson stated there were 27 projects staff was recommending for Federal 4% LIHTC awards. She noted staff reviewed the projects and they met program requirements.

Ms. Ferguson noted three golden rod Staff Report corrections. The first was Hotel Fresno (CA-18-664). There were two corrections, one on the first page in regards to the General Partner entity which was listed incorrectly and the second on the fifth page that had indicated a review wasn't completed by the Local Reviewing Agency when in fact the review had been completed and supported by the local agency. Ms. Ferguson stated that both errors were corrected.

Ms. Ferguson stated the remaining two corrections were identical pertaining to Building 205 (CA-18-788) and Building 208 (CA-18-792). The corrections were identical for the two projects. On page 5 of the Staff Report, CTCAC staff clarified language pertaining to the ownership structure and the tax credits. CTCAC staff want to confirm with the Internal Revenue Service (IRS) if a leasehold interest ownership structure was acceptable prior to the tax credits being issued. CTCAC also removed a requirement to get a private letter ruling in the event staff was unable to get guidance not involving a private letter ruling, typically at the expense of the project owner.

Mr. LoFaso asked whether the guidance language indicates some form of informal guidance acceptable to CTCAC staff.

Ms. Ferguson stated that if IRS was willing to issue guidance on the documents presented then staff would be willing to accept it for the purposes of issuing the tax credits.

Mr. LoFaso appreciated the clarification and noted that he was much more familiar with State issued guidance.

Ms. Ferguson stated CTCAC has a contact at the IRS so staff will start by reaching out to him/her.

Mr. Stivers stated he would expect to see a definitive email.

MOTION: Ms. Wong-Hernandez moved the approval of the 27 projects. Mr. LoFaso seconded and the motion passed unanimously by a roll call vote.

5. Discussion and Consideration of a Resolution to Adopt Proposed Regulations, Title 4 of the California Code of Regulations, Sections 10302 through 10337, Revising Allocation and Other Procedures.

Mr. Stivers stated there were 80 proposed regulation changes in September, many of which were minor and a few that were substantive. CTCAC held four public hearings and had numerous public comments, 36 to be precise. Mr. Stivers stated he issued responses to comments in late November and as a result, made a number of revisions to the proposed regulation changes. Staff also added two minor changes on an emergency basis. Mr. Stivers stated he was happy to answer any questions in regards to the proposed regulation changes.

Mr. Juarez opened the floor to public comment from anyone in the audience.

William Leach with Kingdom Development stated he was supportive of all the regulation changes except one. He stated the proposed change he does not support is in regards to the SB 1380 guidance where housing programs are required to incorporate the core tenants of the Housing First Homeless Service Model (HFHSM). HFHSM is a tool for assisting homeless people by getting them into housing with minimal barriers. Mr. Leach stated there were other HUD approved housing models servicing the homeless such as recovery housing, but it serves as a different tool. Mr. Leach added that with approval of the proposed regulation changes as written, it would be mandating HFHSM in order to receive an award in the nonprofit homeless assistance apportionment. By doing this, Mr. Leach stated that CTCAC would preclude recovery housing. Mr. Leach recommended revising the regulation language to allow the first X% of credits in the nonprofit homeless assistance apportionment go to Housing First projects.

Mr. Stivers responded by stating his firm belief was that the law was intended to mandate Housing First for all units that were set aside for homeless households. He also stated he's CTCAC's representative to the State's Homeless Coordinating Financing Council (HCFC) which SB 1380 directs to oversee implementation of the statute. There is a consensus among those members that Housing First is also a mandate. Mr. Stivers added that Mr. Leach seems to have a different interpretation of what the term "incorporate" means, which is not the interpretation of any of the members of HCFC. As a result, if Mr. Leach is seeking an outcome in terms of how homeless units are treated, it would need to be taken up with the legislature. Mr. Stivers stated CTCAC's proposed regulation change is consistent with State law and Mr. Leach's proposal would not be.

Mr. Juarez asked Mr. Stivers if he agreed with Mr. Leach's assessment that recovery housing is then completely off the table due to the priority given to Housing First.

Mr. Stivers stated for the most part yes in cases where the special needs units are homeless units, but applicants would be able to structure the project to where the project is no longer a special needs project under the program.

Ms. Bates stated that HCD agrees with CTCAC's assessment. HCD also believed they are being mandated to create Housing First policies with all programs serving homeless individuals. HCD also sits on HCFC and implementing Housing First policies across all programs. Ms. Bates indicated that other State departments sit on HCFC as well so program regulations throughout the State are being reviewed and to the extent that they serve homelessness, being revised to incorporate Housing First principles.

Ms. Wong-Hernandez stated at the time the bill went through, she was the Legislative Director for DOF. She stated that their understanding was that it was mandated. Ms. Wong-Hernandez added there were discussions regarding unintended consequences that staff should be concerned about. Ms. Wong-Hernandez stated she agreed with CTCAC and HCD on the issue. She advised Mr. Leach to seek legislative solutions if he has concerns with the language of the bill.

Mr. LoFaso asked Mr. Stivers for more clarification his response to Mr. Juarez's question regarding recovery housing that was not special needs.

Mr. Stivers described the various avenues a project could go in regards to Mr. LoFaso's question and added that there is a provision in the proposed regulation changes, consistent with SB 1380, that a housing provider cannot require a tenant to participate in services. Housing providers receive points from CTCAC for offering services, but they cannot require tenants to participate. Mr. Stivers stated projects structured around these parameters could be brought in that was something other than Housing First.

Mr. LoFaso thanked Mr. Stivers for his response and noted he was sympathetic to Mr. Leach's concern regarding the unintended consequences. He stated that it's important that State agencies align themselves on policies and admires CTCAC's and HCD's vetting with HCFC. In theory, he sympathized with the concerns but noted the statute is strong.

Mr. Leach referenced another proposed regulation change that better codified the fact that projects cannot require tenant services unless there is federal funding (i.e. HUD) mandating services. He asked whether a non-profit homeless assistance apportionment application with HUD funding would be disqualified or if the overarching exception would be okay.

Mr. Stivers stated one of the elements of Housing First is not requiring tenants to participate in services. If a project had funding from a federal program that requires services then CTCAC staff would require the project to meet all the other requirements of Housing First and grant an exception on requiring participation in services.

Mr. Juarez stated that by direction of the conversation, the Committee is not inclined to alter that proposed regulation change but asked Mr. Leach about the specifics on the next issue he wanted to raise.

Mr. Leach stated he was in support of another proposed regulation change in regards to the tiebreaker of the 9% program to remove a paragraph of language referred to as the

"Add Back." He stated the "Add Back" was originally put into place to eliminate one of the two bonuses for public funds since there was a double benefit. Mr. Leach added that the "Add Back" would take away the double benefit and focus on credit efficiency. Mr. Leach stated this unfortunately had some unintended consequences because developers started asking for more credits because asking for less was not advantageous. As a result, Mr. Leach supported the removal of the "Add Back" language. He concluded by noting that in the next year to focus on credit efficiency in CTCAC's tiebreaker to produce the most housing.

Mr. Juarez thanked Mr. Leach for his comments and assured that his comments were noted on the public record and hopefully there will be a future discussion regarding his tiebreaker recommendations.

The next public comment was by Colleen Halbohm, Executive Director with the Wallace House in Sonoma County. She stated that her organization operates homeless services programs for emergency shelters, transitional housing and supportive housing in various properties. Ms. Halbohm added they serve primarily first time homeless seniors who try to survive on \$850 to \$1,000 a month and are priced out of the market. She stated people in homeless services are concerned that because they're being squeezed out from CBDG funding through the Continuum of Care Act, their housing services will be rendered obsolete. Ms. Halbohm stated Housing First is a great idea but can't be a one size fits all because children would have to become chronically homeless in order for the program to help them. She added that the recovery component has to be taken into consideration with the Housing First law to not exacerbate the chronically homeless situation.

Mr. Stivers stated the national government has adopted Housing First as its model of housing and the State has done so as well through SB 1380. CTCAC is in the process of implementing what the legislature has directed staff to do.

Mr. LoFaso stated that he agrees there is a robust debate on the issue at hand and that staff is fulfilling a statutory mandate. He asked Mr. Stivers how the Housing First mandate would apply to CTCAC's program services moving forward.

Mr. Stivers stated the Housing First mandate in CTCAC's regulations would apply to any application that comes in 2018 or later.

Mr. LoFaso then asked a question regarding the HUD coordination on Housing First between State and Federal programs.

Mr. Stivers stated the federal government was the first to endorse the Housing First model which was pushed into the Continuum of Care program. He added that Continuum of Care is the main funding source for homeless services throughout the nation. Mr. Stivers noted that HUD funding needed to go to Housing First programs. The State has doubled down on the requirement where state funds are also subject to the same rule set forth by HUD. Mr. Stivers stated there is a clear alignment between the Federal and State government

which has led to fewer opportunities for housing advocates like Wallace Housing to serve the homeless in a way that is other than Housing First.

Ms. Bates added that these coordinating councils to offer a forum to talk through these issues. The State created the HCFC to address chronically homeless families and youth and Ms. Bates encouraged her to participate.

Ms. Halbohm stated Wallace Housing is not anti-Housing First but because they are not Housing First, it puts them at a disadvantage to secure funding for affordable housing. She closed by stating that at some point in the future the over correction will level out.

The next public comment was by Paul Patierno with Highland Property Development. He commented on proposed regulation change number 41 regarding the abuse of donation credit for a transfer of a tax credit property with HUD Section 8 between a private party seller and a private party buyer. He stated that sellers are obtaining an appraisal of the property upon sale and claiming partial donation credit for the difference between the appraised value and the property sale price. Mr. Patierno claimed these properties simply don't transfer at a discount, which is why the regulation change was being proposed.

Mr. Stivers stated Mr. Patierno is supporting CTCAC's proposed regulation change and therefore has no further comment.

Mr. LoFaso stated he appreciated Mr. Patierno being here and asked if the partial donation is someone alleging that the difference in the sale price and a higher appraised value somehow represents something additional donated where the dollar amount isn't attached to any specific thing like square footage.

Mr. Patierno stated Mr. LoFaso is correct and noted that an applicant obtains an appraisal for the property in excess of the purchase price, and claims that difference as a partial donation.

Mr. LoFaso thanked Mr. Patierno for the clarification. Mr. LoFaso asked if the proposed regulation change is only applicable to claiming tiebreaker credit.

Mr. Stivers stated the partial donation is only relevant when claiming tiebreaker credit.

Mr. LoFaso also asked what the relevance of the HUD rental assistance in getting more reliable values.

Mr. Patierno stated that properties with 100% project-based Section 8 rental subsidies transfer at high prices nationwide to the highest bidder.

Mr. Stivers stated staff has seen donation credit abuse with rental assistance properties with a significant number of subsidized units. He noted the proposed regulation changes would only apply to projects with at least 25% rental assisted units.

Mr. Patierno closed his public comment by noting that the proposed regulation change would not pertain to a project when a public entity is involved.

The next public comment was Natasha Reyes, an attorney with Disability Rights California. Ms. Reyes stated on the phone that there were several issues she wanted to speak to in regards to the proposed regulation changes. Ms. Reyes stated that she supported the proposed regulation change in Section 10325(c) in regards to removing redundancies related to accessibility while not removing additional accessibilities and urges CTCAC to review their proposal again in the upcoming regulation amendment cycle.

Mr. Stivers clarified the regulation section as 10325(c)(8)(B) and stated he worked on the regulation change proposal with the Division of State Architect to remove redundancies. He added that there was no agreement on what existing building codes require and what they do not. Mr. Stivers noted that CTCAC is not in the business of proposing building codes and that staff relies on the Division of State Architect, which is why staff pulled back on the change. Mr. Stivers encouraged the advocates and the various interested parties to discuss with the Division of State Architect what is code and what is not so staff can act accordingly.

Ms. Reyes supported the proposed regulation change in Section 10337(b)(4) regarding the Housing First as long as it brings state law in compliance with federal law.

Ms. Reyes commented on Section 10337(e)(5) and reiterated her support the National Housing Law Project additions to the proposal for criminal background checks. She stated the proposal is very significant and urges staff to revisit the proposal in the upcoming regulation amendment cycle.

Mr. Stivers stated that every project CTCAC funds is subject to State and Federal fair housing laws and HUD under its fair housing arm has determined that various tenant screening practices would have a disparate impact. He noted CTCAC was asked to codify the guidance but not expand on it or define it, as it is a fair housing rule. Mr. Stivers added that the State Department of Fair Employment and Housing is working on further guidance regarding that rule. Mr. Stivers explained CTCAC proposed a very basic regulation but asked by housing advocates to expand on the regulation in much greater detail to which staff is not qualified. He added that CTCAC could come back to the issue with a very basic statement of the fair housing law even though projects are subject to with or without CTCAC's statement. Mr. Stivers stated CTCAC is not in a position to provide further guidance, which every party agrees is necessary. Mr. Stivers added that CTCAC intends to defer to HUD and the State Department of Fair Employment and Housing in enforcing their statutes.

Mr. Juarez asked whether further changes in HUD's statutes would cause further changes in CTCAC regulations.

Mr. Stivers stated it wouldn't change CTCAC's regulations, but noted every project funded with LIHTCs is inherently subject to fair housing law.

Ms. Reyes also stated Disability Rights California would like to see reporting tied to the number of accessible units in each project, occupancy information in regards to whether people with disabilities are actually occupying those units, and the number of waivers being approved. She added Disability Rights California believes this information is important for tracking compliance with regulations.

Mr. Stivers stated CTCAC does not have data on the occupancy of the number of accessible units and staff requires that developers make a certain percentage of units accessible and available. He added that the regulations also require that individuals with disabilities be bumped up the waiting list and the accessible units are offered to individuals with disabilities before being offered to others. Mr. Stivers noted if an individual without disabilities occupies an accessible unit, they agree up front to transfer to another unit if a need for the accessible unit arises. He reiterated CTCAC does not track data related to the occupancy of such units and therefore does not have any data to provide.

Ms. Reyes recommended the projects report to CTCAC on such data to track whether the regulation requirements stated by Mr. Stivers are followed.

Mr. Stivers clarified the recommendations raised by Ms. Reyes would be for future regulation changes and not a part of the action item before the Committee. As a result, Mr. Stivers encouraged the advocates to discuss their requests with CTCAC leadership outside of the regulation change process.

Mr. Juarez asked Mr. Stivers if it would be in CTCAC's power to make such a change in terms on collecting such information.

Mr. Stivers stated that staff would need to look into it. He noted that as part of a HUD requirement, projects currently have to report certain demographics data for which staff employs a contract. Mr. Stivers is unsure if the current contractor could track such information but encourages further discussion around the matter.

Mr. Juarez suggested that Ms. Reyes discuss these concerns with the new incoming administration in January on what can be done in regards to her recommendation.

Ms. Reyes commented on an amendment to the regulations from last year regarding single room occupancy (SRO) units being folded into the Special Needs category. She stated the Disability Rights California asked that CTCAC review the production of special needs units to determine whether the change resulted in any reduction of special needs units. She stated Disability Rights California has not seen any reports or follow-up on this and urged CTCAC to track the number of special needs units to see whether last year's changes had any effects on the number of special needs units.

Mr. Stivers stated as he mentioned the Executive Director's Report, CTCAC did skip the special needs projects in the first round of this year which meant the special needs housing type goal had been met. As a result, staff did not reduce the number of special needs units. He also noted in the second round CTCAC did not reach the housing type goal, which is not unusual. Mr. Stivers stated he is not aware of any diminution of special needs units staff is funding. Mr. Stivers explained that when CTCAC publishes its annual report, the information mentioned above will be contained within. He added that CTCAC staff reports are available online and that any outside party can perform that analysis in anticipation of CTCAC's annual report.

Ms. Reyes thanked the Committee for the opportunity to comment.

The next commenter was also participating by phone and was David Billings with PBR Development. Mr. Billings stated his comments were in regards to the partial donation issue in Section 10325(c)(9)(A)(3), He asked if an appraisal review which is already in the regulations would alleviate the issue.

Mr. Stivers stated if a project is selling at market rate, there is no situation in which a donation should be allowed. He added that going through these efforts to see whether there is a donation or not is extra work for no particular benefit. Mr. Stivers stated CTCAC will assume these are the projects selling at market rate and there is no need to go the extra step.

Mr. Billings stated he appreciates Mr. Stivers' comments and wanted to make sure that there is agreement on the fundamental understanding of the regulation moving forward.

Mr. Juarez thanked everyone present in the room and on the phone for what they do in terms of affordable housing for people who need it the most. He expressed his personal appreciation on behalf of State Treasurer Chiang.

MOTION: Ms. Wong-Hernandez moved to approval the Resolution adopting the regulations. Mr. LoFaso seconded and the motion passed unanimously by a roll call vote.

6. Discussion and Consideration of a Resolution to Adopt a Proposed TCAC/HCD Opportunity Area Map for 2019.

Mr. Stivers stated that staff has engaged a task force of academic experts to assist CTCAC and HCD in the effort of mapping areas of opportunity as an incentive for large family new construction projects. He noted that maps were adopted late last year and put them in place for 2018. Mr. Stivers promised to revisit any changes to the maps and bring them back to the Committee for approval to use in 2019. Mr. Stivers stated there are a number of rather small changes staff is implementing in rural areas along with some other methodological changes. He noted the maps went out for public comment and staff received and responded to six comments. He also noted that Dan Rinzler from the California Housing Partnership, who is a member on the task force and present to answer any questions the Committee may have in regards to the changes to the maps.

Ms. Bates expressed her appreciation for all the work CTCAC has done to lead the mapping effort. She thanked Mr. Rinzler for the continual improvements on the mapping tool.

Mr. LoFaso thanked HCD and CTCAC for the interagency effort on the mapping project and noted that it was important for the Committee to revisit the maps for transparency. Mr. LoFaso asked Mr. Rinzler's for his thoughts on gentrification as it relates to census tracts.

Mr. Rinzler stated the issue of gentrification came up during the first iteration of the opportunity maps that were approved late last year. He added that the taskforce started a methodology to identify certain neighborhoods that have undergone rapid change and perhaps on a trajectory to become higher resource over time. Mr. Rinzler stated the methodology was not ready for implementation this year but will be ready for incorporation into the maps next year.

Mr. LoFaso thanked Mr. Rinzler for his comments.

Mr. Stivers stated CTCAC would not have been able to engage on this policy initiative if it wasn't for the taskforce and thanked Mr. Rinzler for all his efforts and time invested into the maps.

MOTION: Mr. LoFaso moved to approve the Resolution adopting the opportunity maps for use in 2019. Ms. Wong-Hernandez seconded and the motion passed unanimously by a roll call vote.

7. Discussion and Consideration of a Resolution Delegating to the Chair, or his or her designee, the Authority to perform all acts Authorized to the Executive Director of CTCAC in the absence of an Executive Director.

Mr. Stivers stated the Resolution was similar to the one the Committee approved for the California Debt Limit Allocation Committee, authorizing the chair or his/her designee to sign in the absence of an Executive Director.

MOTION: Ms. Wong-Hernandez moved the approval of the Resolution. Mr. LoFaso seconded and the motion passed unanimously by a roll call vote.

8. Public Comment.

None.

Mr. Juarez thanked Mr. Stivers for his public service and thanked him for all the work he's done during his time here in the Treasurer's Office. Mr. Juarez added that the quality of work Mr. Stivers is engaged in is exceptional and that Mr. Stivers is going to continue his work in some sort of fashion as it relates to housing.

Mr. Stivers thanked Mr. Juarez for his sincere comments and announced that he's not going to be staying on with the new administration come January. He noted that he has grown in his position as Executive Director of CTCAC for the past 4 years and thanked his staff for assisting him along the way.

Ms. Wong-Hernandez also thanked Mr. Stivers for the time he spent with her as a board member in explaining things and noted that she is marveled at the amount of work staff does in order to expand and secure affordable housing in the State.

Mr. LoFaso expressed his appreciation for all the work Mr. Stivers has done as Executive Director and noted that although they have disagreed at times, Mr. Stivers has always been a straight shooter and called things as he saw them.

9. Adjournment.

Mr. Juarez adjourned the meeting at 1:00 p.m.

10. Addendum.

The commenter tried to provide a public comment on Agenda Item 6 via phone but was unable to testify and submitted the following comments by email to Mr. Stivers following the meeting:

Hello, thank you Chairman and Members of the Board for allowing me the ability to provide public comment today. My name is Michael Hopkins-Tucker and I am a Policy Analyst for Peoples' Self-Help Housing, a nonprofit affordable housing developer that has been building housing and providing services on the central coast for almost 50 years. However, today, I am speaking in partnership with, and on the behalf of the California Coalition for Rural Housing, or CCRH.

First, we wanted to thank Director Stivers for being so responsive to our comments related to the Opportunity Map designations related to census tracts adjacent to college campuses. We noticed that the areas around universities were being designated as areas of high segregation and poverty, particularly around universities with predominantly affluent populations. These were highly desirable areas that for all intents and purposes should have been identified as high opportunity areas, but instead, were being designated as areas of high segregation and poverty due to the unemployed or partially employed students with alternative sources of income. When we pointed out this concern, CTCAC was quick to respond and added a new student filter, which we are very grateful for.

We thank you for the opportunity to engage in thoughtful and collaborative discussions around these maps to make the Opportunity Maps the best tool that they can be.

In many ways our partnership has been successful and improvements have been made, but the maps are still largely inequitable in many cases and fail to capture areas of opportunity within rural and agricultural communities.

We have a few recommendations, which we believe can improve the way the Opportunity Maps are utilized in small and rural communities.

We encourage CTCAC to direct staff in their 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.

Also, the Rural Working Group should continue to meet with core members of the Fair Housing Task Force every year to ensure that updates to the maps are informed by rural expertise and equitable for rural communities.

We are still of the fundamental belief that 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 the difficult application of census-level data in small and rural communities.

We also recommend that the racial segregation and poverty filter should be removed for rural communities, as other indicators already account for these critical factors and the use of census tracts tends to skew this data in rural areas.

The Opportunity Maps should include a layer documenting and assessing the topography of rural areas. The current maps continue to identify isolated areas, protected forest land, coastal areas, and mountainous regions that are generally undevelopable. Geographical constraints more significantly impact non-urban areas and without such a geographical layer, it will be difficult for the State to get a broader understanding of what areas are actually developable areas of opportunity.

We are not advocating for the impossible task of creating a perfect tool, we just want to make this existing resource a fair, equitable, and useful tool for all communities. As a rural community, we have been here before as we've seen programs without rural set-asides, with insufficient data on rural communities, or with processes that seemed too burdensome to implement in areas with more limited resources. If you'll pardon the pun, we believe we do have a unique opportunity here to create a meaningful model of rural engagement and equity and we hope that you will continue to work with us to make these Opportunity Maps a great resource statewide.

Thank you for your consideration and we look forward to our continued engagement with CTCAC staff to increase opportunity in rural communities.