

HOUSING TRUST TAHOE TAHOE HOUSING HUB

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Sarah Izant, Deputy Secretary for Climate Policy
California Environmental Protection Agency
DACinquiries@calepa.ca.gov

RE: Public Comment on the Preliminary 2026 Disadvantaged Communities Designation, Kings Beach (Placer County)

Dear Deputy Secretary Izant and CalEPA staff,

Our organizations work on workforce housing preservation in the North Lake Tahoe and Truckee region. We are writing about Kings Beach, an unincorporated community on the north shore of Lake Tahoe in Placer County, and about a problem we think the designation creates in places like ours.

We have organized this comment around findings from our own parcel research, because we believe they show a failure mode in the designation that has not been well described.

WHAT WE ARE SEEING IN THE HOUSING STOCK

We recently completed a parcel-level review of small multifamily rental housing in the Placer County portion of the Lake Tahoe Basin. We identified roughly 185 properties. The median was built in 1962. Nearly two-thirds predate 1970, two-thirds contain four units or fewer, and Kings Beach and Tahoe City together hold about 68 percent of the total.

Median ownership tenure runs about 15 years, with nearly half of these properties held twenty years or longer. That is a large group of long-tenured owners approaching retirement or estate settlement. About 17 percent of the properties already hold short-term rental permits, with the pressure concentrated in the smallest buildings, near 38 percent for triplexes and 18 percent for duplexes. The stock turns over at roughly seven properties a year.

What we are describing is unsubsidized affordable housing leaving the permanent rental market. In most California markets those units can eventually be rebuilt. Here they cannot. Placer County's own environmental analysis for the Tahoe Basin Area Plan found that TRPA can issue between 11 and 37 residential units per year across the entire plan area. Land coverage allocations under the Bi-State Compact are finite and effectively non-renewable.¹

WHERE THOSE HOUSEHOLDS GO

They commute. The regional workforce does not shrink when housing disappears, it relocates. BAE Urban Economics, in the 2025 Truckee/North Tahoe Housing Needs Assessment, found in-commuting workers to be the largest cohort of unmet housing demand in the region, at roughly 4,499 units out of a total unmet need of 7,989 at 245 percent of AMI and below. Those workers drive in from Reno, Grass

Valley, and Auburn, distances of 30 to more than 70 miles each way, through winter mountain conditions.²

This is where the designation runs into trouble. Traffic density and diesel particulate matter are both CalEnviroScreen Exposure indicators. So as housing is lost here and the commute lengthens, the tract's Pollution Burden score rises. Eventually it may rise enough to qualify.³

We would rather it did not come to that. Under a fixed development cap, the housing whose loss produced the score cannot be replaced afterward. The designation would arrive as a record of something that had already happened, at the point where the intervention that might have prevented it is no longer available.

WHY THE TRACT DOES NOT QUALIFY NOW

We want to be precise about the mechanism rather than simply calling the result unfair.

CalEnviroScreen calculates the overall score by multiplying the Pollution Burden score by the Population Characteristics score. The draft 5.0 technical report confirms no change to this model from version 4.0. Each component is scaled to a 0-to-10 range against the statewide maximum, which in the draft was 82.1 for Pollution Burden and 95.2 for Population Characteristics. Because the two are multiplied rather than added, a low pollution score suppresses the result no matter how high the population score goes.³

That matters here in a specific way. Housing Burden is itself a CalEnviroScreen Socioeconomic Factor indicator, measuring households that are both low income and severely cost burdened. Placer County reports the highest concentration of renter cost burden anywhere in the county to be in the Kings Beach area. The condition that defines this community is already measured by the tool. It sits on the side of the equation that gets multiplied down.^{3,4}

THIS IS NOT A PROBLEM OF TRACT BOUNDARIES

We expected the usual explanation to apply, that large rural tracts blend distinct populations and hide pockets of poverty. We checked. It does not apply here.

Census Tract 06061020107, Tract 201.07, is close to coterminous with the Kings Beach census-designated place. The tract holds 3,315 residents against the CDP's 3,563, with land area of 7,179,606 square meters against 7,403,909, and identical water area of 301,151 square meters. It does not reach into Carnelian Bay, Tahoe Vista, or the lakefront parcels west of town.⁵

CalEnviroScreen measured Kings Beach, and essentially only Kings Beach, at close to a one-to-one match between the unit of analysis and the community. Whatever explains the result, resolution does not.

TWO STATE TOOLS, ONE TRACT, OPPOSITE ANSWERS

The Air Resources Board's Priority Populations mapping tool identifies this same tract as a low-income community under AB 1550. Same statutory framework, same census geography, same state data. The only difference is the pollution multiplier.⁶

The financial gap between the two determinations is wide. Statute requires at least fifty percent of Affordable Housing and Sustainable Communities Program expenditures to benefit disadvantaged communities, and in FY 2023-24 the program targeted 55 percent of funds to disadvantaged communities against 15 percent to low-income communities. The broader California Climate Investments targets run 25 percent for disadvantaged communities against 5 percent for low-income communities and households. A community the state has already identified as low-income is routed to a pool a fraction the size, in the programs that fit its situation best.^{7,8}

PLACER COUNTY HAS WRITTEN ABOUT THIS

The county's General Plan Community Health Background Report, published December 2024, states that no census tracts in Placer County meet CalEnviroScreen requirements for disadvantaged community status. That is a county of more than 423,000 people with none.⁴

The report also notes a known shortcoming of the tool, that the average score of a large tract can obscure conditions in a smaller neighborhood, and observes that Senate Bill 1000 allows and encourages jurisdictions to identify disadvantaged communities using other data sources and community input.⁴

We think that last point deserves attention. California has already concluded, in statute, that CalEnviroScreen alone does not reliably identify disadvantaged communities, and has directed local governments to supplement it. What has not happened is any equivalent at the level of the SB 535 designation, which is where eligibility for funding is actually decided. A county can correct for the screen in its general plan. It cannot correct for the screen in its access to California Climate Investments.

THE COUNTY'S OWN ANALYSIS REACHES A DIFFERENT CONCLUSION

Placer County's social vulnerability index, prepared for the county Sustainability Plan, identified eight communities in unincorporated Placer County with very high social vulnerability. Three of them, Kings Beach, Tahoe Vista, and Brockway, sit adjacent to one another on the north shore.⁴

For Kings Beach the county documents a high proportion of English-limited households, households in poverty, rental households, and overcrowded households. Tahoe Vista adds a large share of children and households in mobile homes. Brockway adds seniors living alone and severely overcrowded households. None of the three is designated.⁴

SOME CONTEXT ON TAHOE

Air and water quality in the Lake Tahoe Basin are protected by TRPA under the Bi-State Compact, through one of the more restrictive land use regimes in the country. That is why the pollution burden here is low. It is also why housing supply is capped at the levels described earlier.

Kings Beach carries the cost of that protection as permanently foreclosed housing supply, then falls outside the state's environmental investment programs because the protection worked. We do not think that was the intent of SB 535, and we are not asking CalEPA to weaken a pollution standard. We are pointing out that the two effects landed on the same community.

Kings Beach is also a TRPA-designated Town Center under the Placer County Tahoe Basin Area Plan, where residential and mixed uses are allowed and infrastructure and transit already exist. It fits the profile the Affordable Housing and Sustainable Communities Program was designed around.⁹

ON WILDFIRE SMOKE

We have read the draft CES 5.0 technical report and understand that OEHHA removes days with satellite-detected wildfire smoke before calculating the PM_{2.5} indicator, in order to represent a stable distribution of persistent PM_{2.5} burden. We also understand the equity reasoning, that including those days can down-weight low-income communities burdened by traffic and industrial sources. That is a defensible choice for the purpose it serves.³

Our concern is narrower. In Sierra communities, wildfire smoke is not an anomaly in the data. It is the dominant air quality event. During the 2021 Caldor Fire, Tahoe Vista, immediately adjacent to Kings Beach, recorded an air quality index of 448, reported as the worst in the United States and more than forty times the World Health Organization exposure recommendation. At one point it exceeded the index's 0-to-500 range at 596, and regional readings were reported as the worst in the world. None of that appears in the indicator that determines designation.¹⁰

The technical report notes that OEHHA has already produced a comparison showing PM_{2.5} scores with wildfire days included, viewable through a toggle map. Our request below reflects that the analysis already exists.³

WHAT WE ARE ASKING

First, publish the list of census tracts that score high on Population Characteristics and low on Pollution Burden. Both values are already calculated. Releasing them changes no methodology and delays nothing, but it would let California Climate Investments agencies apply supplemental scoring under their existing guidelines and let counties see where the screen's blind spots fall inside their boundaries.

Second, publish the wildfire-inclusive PM_{2.5} comparison at the tract level in downloadable form alongside the toggle map. We are not asking OEHHA to change the indicator. We are asking that work already done be made usable by program administrators and by the communities where episodic smoke is the main exposure.

Third, consider a designation category for census tracts already identified as AB 1550 low-income communities that also rank in the highest 25 percent statewide on Population Characteristics. Both inputs exist and are already published by state agencies.

Fourth, we would like to know when the Air Resources Board expects to republish the Priority Populations mapping tool on CalEnviroScreen 5.0, and whether the AB 1550 layer will be refreshed with current American Community Survey data at the same time.

We are glad to share our parcel data, provide any source cited here, or host CalEPA staff in Kings Beach.

Sincerely,



Erin Casey

Chief Executive Officer

Housing Trust Tahoe and Tahoe Housing Hub

SOURCES

1. Placer County, Tahoe Basin Area Plan EIR/EIS, Chapter 6, Population and Housing.
2. BAE Urban Economics, 2025 Truckee/North Tahoe Housing Needs Assessment Update, prepared for the Tahoe Truckee Community Foundation, p. 12.
3. OEHHA, Draft CalEnviroScreen 5.0 Public Review Technical Report, January 2026. Model and scoring formula, pp. 7-16; PM_{2.5} methodology and wildfire smoke day exclusion, pp. 20-21 and 41-44; Housing Burden indicator, p. 27; worked example calculation, pp. 29-32.
4. Placer County Community Development and Resource Agency, Placer County General Plan Community Health Background Report, December 2024. Disadvantaged communities assessment, p. 15; low-income communities and renter cost burden, p. 10; social vulnerability index, pp. 17-18.
5. U.S. Census Bureau geocoder, 2020 vintage, Census Tract 06061020107 and Kings Beach CDP (GEOID 0638548).
6. California Air Resources Board, California Climate Investments Priority Populations Mapping Tool.
7. Strategic Growth Council, AHSC Program staff report, October 31, 2024; California Department of Housing and Community Development, AHSC Round 8 Program Guidelines.
8. California Air Resources Board, California Climate Investments FY 2024-25 Investment Targets.
9. Placer County and TRPA, Placer County Tahoe Basin Area Plan.
10. CBS News and NBC Bay Area, August 2021, reporting IQAir, Purple Air, and Los Angeles Times data.