



TRANSIT DISTRICT MEMBERS:

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September 15, 2014

Ms. Shelby Livingston, Chief
Climate Investments Branch
California Air Resources Board
1001 I Street, P.O. Box 2815
Sacramento, CA 95812

Mr. Arsenio Mataka, Assistant Secretary
Environmental Justice and Tribal Affairs
California Environmental Protection Agency
1001 I Street, P.O. Box 2815
Sacramento, CA 95812

Subject: Defining Disadvantaged Communities under Cap and Trade Program

Dear Ms. Livingston and Mr. Mataka:

Thank you for the opportunity to comment on the definition of a disadvantaged community as it relates to the Cap and Trade Program. Monterey-Salinas Transit serves nearly 4 million passengers every year on public transportation throughout Monterey County and beyond. MST has been very successful in establishing and maintaining partnerships with the military in Monterey County in providing transit service which benefit the military and veterans.

MST urges CARB and ARB to recognize the military and veterans as disadvantaged communities for the reasons outlined below and in consideration of the opportunity to reduce greenhouse gas emissions from this sector of the population:

- There are nearly 250,000 military personnel stationed in California and 2 million veterans living in California.
- Transit service directly benefits the military and veterans, providing transit to jobs, shopping, and medical appointments.
- There should be a synergy between the Cap and Trade program and the Governors Military Council, showing a California commitment in supporting the long-term home of the military in California.
- The Governor's Military Council was convened to protect California's military installations and operations amid ongoing Department of Defense budget cuts, and to

leverage changes in federal military strategy to position the state to continue innovation and leadership in its military mission.

- Transit to and from California's military installations demonstrates a strong commitment to protecting a continued military presence.
- Annually at Monterey-Salinas Transit, 900,000 military passengers are served by transit.
- Twenty MST lines serve three military installations including the Defense Language Institute at the Presidio of Monterey, the Naval Postgraduate School in Monterey, and Fort Hunter Liggett in the remote area of southern Monterey County.
- MST is currently assessing the feasibility of expanding service to a fourth military installation in Monterey County – Camp Roberts.
- Other California transit agencies serving the military include:
 1. North County Transit District in San Diego serving Camp Pendleton,
 2. Fairfield and Suisun Transit serving Travis AFB,
 3. Morongo Basin Transit Authority serving 29 Palms Marine Corps Base,
 4. Victor Valley Transit Authority serving Fort Irwin, and
 5. Kings Area Rural Transit serving Lemoore Naval Air Station

Expanding the definition of a disadvantaged community where there are military installations will have direct air pollution reduction benefit to the State of California. Many military installations have been shown to be inherently generators of a variety of pollution types, many of which are not detected until after the military decommissions a base. It is possible that these pollution factors are insufficiently accounted for in the Cal EnviroScreen 2.0 methodology used to define a disadvantaged community for the Cap and Trade programs currently under development.

Many of the military personnel stationed at the 40 California military bases are here on a temporary basis to train or learn and, hence may not be counted in census data used to define low income, disadvantaged communities. In addition, a significant number of these individuals and their families do not have access to a vehicle and rely on public transportation for their activities outside of training and learning. And, given the remote location of several of these facilities, including both Fort Hunter Liggett and Camp Roberts in rural southern Monterey County, staff and personnel often have to drive long distances from home to reach their assigned work location.

Furthermore, there are increasing numbers of veterans returning from the conflicts in Iraq and Afghanistan who need public transportation equipped with a wheelchair lift to get to veterans services, grocery shopping, jobs, and other activities. Veterans are in need of special attention for the sacrifices they have made for our country. Given their deployment overseas, veterans is another military-related population that may have not been adequately counted in the most recent decennial census.

MST urges the CARB and ARB to recognize the military and veterans as a disadvantaged community which will allow Cap and Trade monies to be eligible to benefit transit projects focused on these groups.

Please do not hesitate to contact me if you have any questions.

Sincerely,



Carl G. Sedoryk
General Manager/CEO