



September 17, 2014

Cal/EPA Secretary Matthew Rodriquez
1001 I Street
Sacramento, CA 95812

Mary Nichols, Chairman
California Air Resources Board
1001 I Street
Sacramento, CA 95812

Dear Secretary Rodriquez and Chairman Nichols:

Thank you for the opportunity to provide comments on the California Air Resources Board's *Investments to Benefit Disadvantage Communities Interim Guidance to Agencies Administering Greenhouse Gas Reduction Fund Monies* and the California Environmental Protection Agency's Office of Environmental Health Hazard Assessment *Approaches to Identifying Disadvantaged Communities*.

As you are well aware, the San Joaquin Valley faces significant air quality and economic challenges. A number of Valley communities are highly impacted by both pollution burden and socioeconomic challenges. In fact, 22 out of the top 30 California communities ranked through the newly released version of CalEnviroScreen are located in the San Joaquin Valley. These communities also lack the resources necessary to effectively compete for state resources and as such have not received the amount of state investment as wealthier more urban areas have.

The San Joaquin Valley Air Pollution Control District supports the policies established by SB 535, and believes that targeting state resources to disadvantaged communities that are identified through the use of the CalEnviroScreen model is the most appropriate use of that tool. Towards that end, the District has the following comments on the two draft documents:

SB 535 established clear criteria as to what characteristics should be considered in identifying disadvantaged communities. In summary, these criteria include:

- Areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure or environmental degradation.

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- Areas with concentrations of people that are of low income, high unemployment, low levels of home ownership, high rent burden, sensitive populations, or low levels of educational attainment.

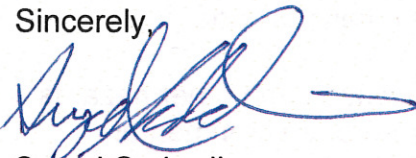
CalEPA has developed five potential calculation methods for identifying disadvantaged communities. Given the criteria established under SB 535, the District supports the utilization of Method 1 that identifies communities with the top scores for combined pollution burden and population characteristics, and Method 4 that utilizes top scores with equal cutpoints for pollution burden and population characteristics. The District believes that the proper way to assess community needs is through consideration of the cumulative impact. For example, poor communities that lack the wherewithal to access adequate healthcare and nutrition are more susceptible to environmental burdens. Methods 1 and 4 are the only methods that clearly meet the two SB 535 requirements of identifying communities that are impacted both by pollution burden and socioeconomic factors.

Additionally, under each of the proposed methods, CalEPA has produced data identifying the communities that rank in the highest 15%, 20% and 25% most disadvantaged communities. The District believes that regardless of the calculation method selected, the cutpoint that is chosen should be at the higher end of this range to ensure that the criteria is inclusive and does not arbitrarily eliminate disadvantaged communities from participating and benefitting from available funding.

In providing guidance to state agencies on which projects meet the SB 535 requirements of 10% of Cap and Trade funding being directly invested in disadvantaged communities and 25% of the funding be invested to benefit disadvantaged communities, ARB has identified criteria and example project types. The District is a strong advocate of utilizing Cap and Trade funds to fund projects that reduce both greenhouse gas emissions and criteria pollutant emissions in regions that are already impacted by air pollution. With that in mind, the District believes that projects that reduce regional pollution in air basins that are non-attainment for criteria pollutants should be considered to benefit disadvantaged communities if the criteria pollutant emission reduction can be demonstrated to provide direct benefits to disadvantaged communities.

Thank you for the opportunity to comment on the proposed guidelines, and I would be happy to discuss these issues further with you at your convenience.

Sincerely,



Seyed Sadredin
Executive Director/APCO