



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

June 22, 2015

Mr. Richard Corey  
Executive Officer  
Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812

**RE: Fiscal Year 2015-16 Funding Plan for the Low Carbon Transportation Investments and Air Quality Improvement Program**

Dear Mr. Cory:

On behalf of the Rural County Representatives of California (RCRC), I would like to express our support for the proposed \$5 million set aside from the bus allocation under the Zero-Emission Truck and Bus Pilot Commercial Deployment to provide incentives for school buses in rural school districts. RCRC is an association of thirty-four rural California counties and the RCRC Board of Directors is comprised of elected supervisors from each of the member counties.

The proposed set aside would provide schoolbus replacement grants to school districts in rural areas. This is a valuable recognition that the CalEPA/OEHHA CalEnviroScreen tool definition of “disadvantaged communities” (DACs) disqualifies 29 counties and their rural school districts from qualifying for the 50 percent or greater DAC targeted funds for this program.

RCRC has advocated that strictly using the CalEnviroScreen scores unfairly limits rural county eligibility for Greenhouse Gas Reduction Fund (GGRF) monies earmarked for disadvantaged communities. Health and Safety Code Section 39711 specifically states:

These communities shall be identified based on geographic, socioeconomic, public health, and environmental hazard criteria, and may include, but are not limited to, **either** of the following:

1215 K Street, Suite 1650, Sacramento, CA 95814 | [www.rcrcnet.org](http://www.rcrcnet.org) | 916.447.4806 | FAX: 916.448.3154

Mr. Richard Corey  
Funding Plan for the Low Carbon Transportation  
June 22, 2015  
Page 2

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

(b) Areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment.

The statute specifies “either” of the following, not “both” of the following. The CalEnviroScreen multiplies the pollution burdens by the population characteristics, thus basically eliminating areas of the State with good air quality from being defined as disadvantaged communities, no matter what the population characteristics represent.

The proposed set aside will aid those schools statewide in most need of new buses—including those within the 29 counties ineligible under the CalEnviroScreen definition. For the above reasons, RCRC especially supports having a rural school district set aside. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Mary Pitto". The signature is written in a cursive style with a large, looped initial "M".

MARY PITTO  
Regulatory Affairs Advocate

cc: RCRC Board of Directors  
Matthew Rodriguez, Secretary, CalEPA  
George Alexeeff, Director, OEHHA