



February 17, 2017

Charanya Varadarajan
Manager – Investment Plan, Disadvantaged Communities
California Air Resources Board
1001 I St.
Sacramento, CA 95812

RE: Proposed methodology for identifying low-income communities under Assembly Bill 1550 (Gomez)

Dear Ms. Varadarajan:

The Rural County Representatives of California (RCRC) is an association of thirty-five California counties and the RCRC Board of Directors is comprised of elected supervisors from each of those member counties. RCRC member counties are tasked with a variety of decision-making responsibilities related to land use and development in rural California communities and are challenged with environmental stewardship, economic vitality, and social equity at the local level. We appreciate this opportunity to comment on the proposed methodology for identifying low-income communities under the recent enactment of Assembly Bill 1550 (Gomez).

RCRC has long-opposed the California Environmental Protection Agency's (CalEPA) sole use of the California Communities Environmental Health Screening Tool (CalEnviroScreen) to identify disadvantaged communities (DACs) for the purposes of allocating monies from the Greenhouse Gas Reduction Fund (GGRF), particularly since the Legislature has routinely allocated a much larger percentage of the GGRF to DACs than what is required by Senate Bill 535 (de León), which was enacted in 2012. The use of CalEnviroScreen to define DACs effectively denies thirty California counties, many of which contain forested communities that are severely socioeconomically disadvantaged and considered DACs under other definitions, any chance to see those earmarked funds used for projects benefiting their communities. Rural communities also generally have fewer resources to compete against urban and suburban projects for the remaining funds not reserved for DACs. The result has been citizens living in these rural areas of California receiving little benefit from cap and trade proceeds.

In light of our concerns with CalEPA's insistence on using CalEnviroScreen to define DACs and unwillingness to consider other appropriate definitions, RCRC is

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pleased to support the proposed methodology for identifying low-income communities under AB 1550. The methodology fully considers the abject poverty present in many of California's rural areas by utilizing the median household income definition, while appropriately correcting for disparities in cost of living with the Department of Housing and Community Development state income limits. RCRC believes this is an equitable means of determining which communities should qualify as "low-income" under AB 1550, and is pleased to see many communities covered that are otherwise excluded under the DAC definition.

The one recommendation and concern we would like to express is the complete lack of any outreach to California residents in the northern and eastern parts of the State that will now be captured under the "low-income" definition. Holding community outreach events no further north than Oakland is neither an acceptable nor inclusive method of reaching all communities that should receive benefit from GGRF funding opportunities under the "low-income" definition. While we realize that the Air Resources Board has long-focused on disadvantaged communities as defined by CalEnviroScreen and is therefore not accustomed to expanding outreach to the State's more rural, forested areas, we would hope in the future that discussions surrounding AB 1550 implementation will be more inclusive of all communities that can and should be included in GGRF funding opportunities under the "low-income" definition. RCRC would be happy to help facilitate such outreach in our member county communities should you need assistance.

If you should have any questions or would like to discuss our comments further, please contact me at (916) 447-4806 or sheaton@rcrcnet.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton", with a stylized flourish at the end.

STACI HEATON
Regulatory Affairs Advocate

cc: Arsenio Mataka, Assistant Secretary, California Environmental Protection Agency
Mary Nichols, Chair, California Air Resources Board
The Honorable Jimmy Gomez, Member, California State Assembly
RCRC Board of Directors