

September 11, 2014

California Air Resources Board  
Public Information Office  
1001 I Street, First Floor Environmental Services Center  
Sacramento, California, 95814



SIERRA NEVADA ALLIANCE

*Keeping light in the range.*

**RE: Cap-and-Trade Auction Proceeds, Investments to Benefit Disadvantaged Communities: Interim Guidance to Agencies Administering Greenhouse Gas Reduction Fund Monies – Draft for Comment**

On behalf of the Sierra Nevada Alliance, we write to provide comments on the “*Cap-and-Trade Auction Proceeds, Investments to Benefit Disadvantaged Communities: Interim Guidance to Agencies Administering Greenhouse Gas Reduction Fund Monies – Draft for Comment.*” Since 1993 the Sierra Nevada Alliance has been protecting and restoring Sierra lands, water, wildlife and communities. Our mission is to protect and restore the natural resources of the Sierra Nevada for future generations while promoting sustainable communities. We are truly an Alliance, with over ninety-five Member Groups and nearly 10,000 individuals that span the entire 400 mile mountain range. Our member groups work on a broad range of conservation issues including watersheds and energy. We also work with and coordinate all 12 of the Sierra Region Integrated Regional Water Management (IRWM) groups through the Sierra Water Workgroup.

As you know, over 60% of California’s developed water comes from Sierra watersheds and we provide nearly half of the state’s timber resources. The Sierra Nevada region is home to a disproportionately large number of disadvantaged communities (DACs). Using the median household income (MHI) indicator, our region’s income is at or below 80% of the state’s (MHI). According to 2010 Census Data, over 40% of the range’s (based on Sierra Nevada Conservancy’s boundary) communities and nearly 70% of our individual residents lives in disadvantaged communities, which is concerning as compared to other regions of the state. Given the geographically dispersed nature of the range, disadvantaged communities within the Sierra lack the resources necessary to adequately quantify, monitor and protect their resources. The Sierra Nevada region accounts for about 22% of California’s land area, but less than 7% of the state’s population. This makes it very difficult for Sierra sustainability efforts to compete with large population centers.

The Cap-and-Trade Auction Proceeds will provide much-needed funding for communities across California and we thank you for this opportunity to provide input. Our top concern with the Draft is the proposed DAC criteria. The CalEnviroScreen tool is not a good indicator of disadvantage. It almost exclusively precludes Sierra Nevada and other rural areas in the state. Median household income (MHI) should be the primary indicator for directing funding to DACs until a tool that ensures more equity is developed.

We thank you for taking public comments and look forward to the release of the final guidelines.

Gavin Feiger

A handwritten signature in black ink, appearing to read "Gavin Feiger", with a long horizontal stroke extending to the right.

Acting Executive Director