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September 10, 2014

Ms. Shelby Livingston, Chief
Climate Investments Branch
California Air Resources Board
1001 I Street
Sacramento, CA 95814

Mr. John Faust
Chief, Community Assessment & Research Section
Office of Environmental Health Hazard Assessment
California Environmental Protection Agency
1515 Clay Street, Suite 1600
Oakland, CA 94612

Re: CalEPA's Proposed Approaches to Identifying and ARB's Draft Interim Guidance on Investments to Benefit "Disadvantaged Communities"

Dear Ms. Livingston and Mr. Faust:

Thank you for the opportunity to comment on the California Environmental Protection Agency's (CalEPA) proposed "Approaches to Identifying Disadvantaged Communities" and the California Air Resources Board's (ARB) draft Interim Guidance concerning "Investments to Benefit Disadvantaged Communities." As the Metropolitan Planning Organization and Regional Transportation Planning Agency for Santa Barbara County, the Santa Barbara County Association of Governments (SBCAG) is interested in providing feedback on these draft documents and the potential implications for disadvantaged populations in the region we serve and throughout the state, as well as for the climate goals of AB 32.

As presently conceived, the proposed CalEPA approaches to identifying disadvantaged communities are not consistent with the intent of AB 1532 and SB 535 or the Cap & Trade program goals and will entirely leave out many, real disadvantaged populations around the state. The proposed CalEPA approaches do not appear to recognize any "disadvantaged communities" whatsoever in 33 of California's 58 counties, including Santa Barbara County, contrary to what common sense and basic Census information tell us about our populations. Even more fundamentally, the proposed approaches fail to make the connection between the State's two statutory goals of (1) reducing GHG emissions and (2) helping disadvantaged communities. It is vitally important that the State, in pursuing the second goal, does not inadvertently undermine the first.

SBCAG advocates for a common sense definition of "disadvantaged communities" that, consistent with SB 535, relies on basic population characteristics based on straightforward application of U.S. Census data and avoids bias and geographic inequity. The best, most current example of such a definition is the approach taken by the Active Transportation Program (ATP) Guidelines, which partly rely on the CalEnviroscreen tool, but also on direct measures of median household income and other factors and allow project applicants some flexibility in

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demonstrating why a community should be considered “disadvantaged.” SBCAG strongly recommends that CalEPA and ARB adopt a similar approach.

The identification of disadvantaged communities and targeting of benefits to these communities should recognize that members of such communities are mobile and often commute long distances to work each day. CalEPA and ARB should adopt a socioeconomic approach that focuses on populations that are inherently mobile, rather than a narrow geographic focus based on location of residence. For example, by too narrowly defining what “benefits” disadvantaged communities to projects within a ½-mile radius of them, the draft ARB Interim Guidance threatens to undermine the efforts of SBCAG’s adopted Sustainable Communities Strategy to reduce commute trip distances and GHG emissions by encouraging new affordable housing near jobs centers. Also, to consider environmental hazard criteria as required by SB 535 in a way that is consistent with and prioritizes AB 32’s overarching goal of GHG reduction, CalEPA should address GHG emissions and the effects of climate change themselves as an environmental justice issue of prime importance.

In both the identification of “disadvantaged communities” and the determination of what benefits such communities, SBCAG also suggests that the State should consider and apply indicators of jobs-access and housing affordability that address the fundamental relationship between the core concerns of AB 32 and the protection of disadvantaged populations. People who do not have access to good jobs nearby or who cannot afford to live close to job opportunities are forced to commute long distances to find work. This circumstance both imposes hardship and economic burden on those affected and results in higher vehicle emissions. The State can best help disadvantaged populations and simultaneously further the goals of AB 32 by investing Cap & Trade revenues in ways that incentivize new affordable housing near jobs and directly address this problem.

Because (as recognized by the joint workshops held last month by CALEPA and ARB) the two draft documents are inter-related, SBCAG provides a single set of comments that apply to both. Together, the method selected for identifying disadvantaged communities and the agency guidance on what counts as benefitting such communities will determine where and how a large portion of Cap & Trade Program revenues will be invested and who will benefit from these investments.¹ If administered well, these programs have the potential both to advance the purposes of AB 32 by reducing greenhouse gas emissions and to provide important economic and health benefits to California’s most vulnerable populations. However, if these programs are mismanaged, a tremendous opportunity will have been squandered.

A. Identification of Disadvantaged Communities

CalEPA’s proposed “Approaches to Identifying Disadvantaged Communities” considers five different possible methodologies to identify “disadvantaged communities.” All five are based on the CalEnviroScreen tool. The five methodologies involve various weightings of 19 indicators, grouped in two categories: “pollution burden” and “population characteristics.”

¹ As required by SB 535, a minimum of 10 percent of cap-and-trade-funded projects must be located in “disadvantaged communities” and a minimum of 25 percent of such projects must benefit such communities. For the new Affordable Housing and Sustainable Communities (AHSC) Program, which per SB 862 would receive 20 percent of Cap and Trade revenue, fully 50 percent of projects must benefit “disadvantaged communities.”

Preliminarily, so that communities throughout the state can better understand the effect of the proposed approaches, SBCAG formally requests that CalEPA publish a list of census tracts by jurisdiction that would qualify as "disadvantaged communities" for each proposed method. While the maps published with the "Proposed Approaches" document are helpful in giving a broad impression of where disadvantaged communities would be located for each method, they do not provide adequate detail.

Disadvantaged Populations in Santa Barbara County

Notably, from the maps published with the proposed "Approaches" document, it appears that none of the methodologies identify any disadvantaged communities in Santa Barbara County. Per CalEnviroScreen, no tracts within Santa Barbara County have combined pollution burden and population characteristics profile scores over 80 (which is the proposed cut-off for recognizing disadvantaged populations). Thus, if the CalEnviroScreen analysis is to be believed, Santa Barbara County has no disadvantaged populations at all.

Contrary to the CalEnviroScreen conclusions, according to U.S. Census data, Santa Barbara County in fact has significant disadvantaged populations that must be recognized by any common sense definition. As the enclosed Fact Sheet shows, basic indicators of low-income, minority and educational status show that numerous census tracts are "disadvantaged" on any reasonable understanding of the term. For example, there are numerous census tracts where the vast majority of the population is impoverished (lives two times below the federal poverty level), is Hispanic, or has no high school education. Other census tracts show a prevalence of households where English is not spoken well or that have no vehicle available. The maps attached to the Fact Sheet show the location of these populations.

Proposed CalEPA Approaches Result in Regional Geographic Inequity Statewide

Area-wise, the proposed CalEPA approaches exclude more than half of the state. By CalEPA's definition, only the top 20% of census tracts on any of the weighted scoring systems are recognized as being "disadvantaged." However, if the CalEnviroScreen analysis is correct, only 25 of California's 58 counties (43%) have any populations that would qualify as "disadvantaged."

CalEnviroScreen, as it is proposed to be applied, is highly selective and results in serious regional geographic inequity in the identification of disadvantaged populations. There is inequity because many excluded areas, like SB County, actually do have populations that should, by rights and by any common sense understanding of the term, be recognized as "disadvantaged."

Common Sense-Check Needed

SBCAG recognizes the level of effort that has gone into the development of the CalEnviroScreen tool and the care that has been taken to keep the proposed methodologies objective and "scientific." However, at this point, a common sense-check is needed that evaluates the results of the proposed approaches against our common sense understanding of what constitutes "disadvantaged."

If communities that meet a common sense definition of "disadvantaged" are being excluded, and more than half the state is entirely left out, then something is wrong. A definition of "disadvantaged communities" that excludes largely low income and minority communities over

more than half the state will make these communities ineligible for a significant portion of this funding and result in clear inequity.

Even the best-intentioned science may mask hidden biases. CalEPA should consider what biases the selection of the nineteen CalEnviroScreen indicators and their grouping into the "pollution burden" and "population characteristics" conceal. Each of the proposed approaches de facto weights the nineteen indicators and the very selection and inclusion of these indicators - and exclusion of others - skews the results. For example, some indicators grouped under "population characteristics" category reflect an environmental justice bias. Low birth weight, as just one example, is nominally a "population characteristic," but this statistic implies a cause-effect relationship, since the low birth weight is presumably caused by in utero exposure to harmful chemicals. This indicator should thus more appropriately be grouped under "pollution burden," not "population characteristics." Including it in the "population characteristics" category skews the results toward "pollution burden."

In general, a heavier emphasis on "pollution burden" measures results in the exclusion of populations that meet our common sense understanding of "disadvantaged." In fact, the basic population characteristics of disadvantaged populations themselves indicate populations that are disproportionately vulnerable to environmental harm, without requiring a direct measure of "pollution burden."

CalEPA Discretion

SB 535 gave CalEPA broad discretion as to how to define "disadvantaged communities" and did not explicitly require the use of CalEnviroScreen. While the law stated broad categories ("geographic, socioeconomic, public health, and environmental hazard criteria") upon which CalEPA must base the identification of "disadvantaged communities," it did not stipulate precisely how CalEPA should weight different indicators and offered CalEPA a non-mandatory, non-exclusive list of criteria to consider. As amended by SB 353, Health & Safety Code section 39711 states:

The California Environmental Protection Agency shall identify disadvantaged communities for investment opportunities related to this chapter. 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:

- (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.*

Indicators of disadvantaged communities' population characteristics inherently indicate vulnerability to pollution. Separate pollution burden factors are unnecessary. CalEPA can validly consider environmental hazard criteria by evaluating just population characteristics.

More Equitable and Objective Indicators

The attached Fact Sheet lists a number of indicators of disadvantaged populations that SBCAG believes comport more closely with both the California Legislature's intentions and our common sense understanding of what "disadvantaged" means. At minimum, basic measures such as low income and minority status should be given higher weighting or should be used as a stand-alone qualifying criterion in a manner similar to the way the ATP Guidelines apply median household income less than 80% of the statewide median. SB 244 is another example of existing law that defines "disadvantaged community" for local land use planning purposes solely based on annual median household income.²

In this regard, the approach taken by the recent Active Transportation Program (ATP) Guidelines is worth close study and emulation. This approach has the advantage of allowing project applicants to rely either on the CalEnviroScreen tool or on direct measures such as median household income. It also gives applicants flexibility to make their own demonstration as to why a community should be considered disadvantaged:

DISADVANTAGED COMMUNITIES

For a project to contribute toward the Disadvantaged Communities funding requirement, the project must clearly demonstrate a benefit to a community that meets any of the following criteria:

- *The median household income is less than 80% of the statewide median based on the most current census tract level data from the American Community Survey. Data is available at <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>*
- *An area identified as among the most disadvantaged 10% in the state according to latest versions of the California Communities Environmental Health Screening Tool (CalEnviroScreen) scores. Scores are available at <http://oehha.ca.gov/ej/ces11.html>.*
- *At least 75% of public school students in the project area are eligible to receive free or reduced price meals under the National School Lunch Program. Data is available at <http://www.cde.ca.gov/ds/sd/sd/filessp.asp>. Applicants using this measure must indicate how the project benefits the school students in the project area or, for projects not directly benefiting school students, explain why this measure is representative of the larger community.*

If a project applicant believes a project benefits a disadvantaged community but the project does not meet the aforementioned criteria, the applicant must submit for consideration a quantitative assessment of why the community should be considered disadvantaged.

ATP Guidelines, p. 7.

http://www.catc.ca.gov/programs/ATP/2014_ATP_Guidelines_adopted_032014.pdf

² A "disadvantaged community" is "a community with an annual median household income that is less than 80 percent of the statewide annual median household income." Water Code § 79505.5(a).

In addition, the ATP Guidelines allow MPOs, in administering a competitive selection process, to use different criteria for determining which projects benefit Disadvantaged Communities if the criteria are approved by the Commission prior to an MPO's call for projects.

The State Should Consider Jobs-Housing Indicators That Address Both Disadvantaged Communities and GHG Emissions

As a further approach to identifying “disadvantaged communities,” we also suggest that the State seriously consider other indicators related to jobs access and housing affordability. Such indicators simultaneously address the relationship between “disadvantaged” status and the goal of reducing GHG emissions, supporting the stated goals of both AB 32 and SB 535. Some such indicators might include:

- housing costs relative to income (paying over 30% of income to rent)
- home ownership rate
- vacancy rate
- travel time
- jobs/housing relationship

The UC Davis Center for Regional Change has also produced another relevant metric worthy of consideration. Described in more detail in the attached Fact Sheet, this measure uses a ratio of low-wage jobs to affordable housing units, identifying places with significant shortages of affordable housing for the low-wage workers employed in those places.

Each of these possible indicators gets at a core feature of what it means to be “disadvantaged” in California today: the inability to afford decent housing near good employment opportunities and the consequent need to commute long distances to work. At the same time, they address increasing GHG emissions resulting from higher vehicle miles traveled. Long commute distances result in direct economic burdens and other costs to disadvantaged communities. They also result in higher vehicle emissions and GHG generation. Insofar as jobs-housing indicators address both economic disadvantage and GHG emissions, they target the crux of the inter-related issues that the State is concerned with solving. CalEPA and other State agencies would be well-served to focus their attention on such measures.

B. Investments to Benefit Disadvantaged Communities

ARB's draft Interim Guidance concerning “Investments to Benefit Disadvantaged Communities” provides guidance to State agencies administering Cap & Trade Revenue programs on how to determine what projects benefit disadvantaged communities identified by CalEPA. The draft document laudably recognizes the dual purpose of both helping disadvantaged communities and reducing GHG emissions at the same time. However, the criteria for project evaluation unfortunately do not effectively serve both goals.

In particular, Appendix 1-2, dealing with evaluation of projects for the Affordable Housing and Sustainable Communities (AHSC) program, would require that, in order to be eligible as “benefitting” a disadvantaged community, projects must be located with 1/2 mile of a disadvantaged community.

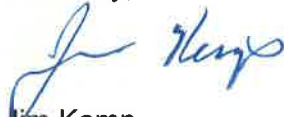
Circumscribing eligible projects within a narrow, ½-mile band around disadvantaged communities undermines AB 32's core goal. As with the identification of disadvantaged

communities, determining benefit to such communities must take into account the fundamental problematic that links disadvantaged communities and GHG emissions: access to jobs and housing affordability. If the State truly wants to help disadvantaged communities and reduce automobile emissions at the same time, then it is necessary to locate new affordable housing near where disadvantaged community members work, not necessarily where they live now. To the extent that these communities are located in lower cost areas far from job centers, investing heavily in affordable housing only in such locations will have the effect of increasing average commute distance, vehicle miles traveled and GHG emissions - at odds with the purpose of AB 32 and SB 862. Encouraging housing construction far away from jobs centers would also undermine the central approach of SBCAG's Sustainable Communities Strategy to reduce GHG emissions. ARB should review all eligibility criteria for the minimum 25% "benefit" requirement and revise conditions that impose overly narrow geographic proximity requirements to identified disadvantaged communities.

In closing, SBCAG requests both CalEPA and ARB to back up and take another look at both the proposed approaches to identifying "disadvantaged communities" and what counts as "benefitting" them. We encourage CalEPA to consider a broader, more flexible approach, such as the Active Transportation Program Guidelines', that, still consistent with SB 535, obtains results more in alignment with our common sense understanding of "disadvantaged communities." We similarly encourage ARB to make certain that incentives for projects to "benefit" disadvantaged communities are in alignment with the larger goals of AB 32 to reduce GHG emissions and account for fundamental jobs-housing relationships responsible for commute distances and vehicle emissions.

Thank you again for the opportunity to comment and please do not hesitate to contact me with any questions.

Sincerely,



Jim Kemp
Executive Director

Encl.: Fact Sheet, Disadvantaged Communities in Santa Barbara County and Statewide

cc: Hannah-Beth Jackson, 19th Senate District
Das Williams, 37th Assembly District
Bill Higgins, CALCOG Executive Director
Alison Joe, Deputy Director, Strategic Growth Council

Fact Sheet
Disadvantaged Communities in Santa Barbara County and Statewide

A. Santa Barbara County Indicators of Low-Income, Minority and Disadvantaged Populations

Contrary to the CalEnviroScreen conclusions, according to U.S. Census data, Santa Barbara County has significant disadvantaged populations that must be recognized. Maps of indicators are included in Attachment 1.

1. **Low Income-Poverty**
2. **Minority-Hispanic**
3. **Other Measures of Disadvantaged Populations**
 - a. Households without a Vehicle
 - b. Persons Over 25 without a HS Diploma
 - c. Households Where English is Not Spoken Well

Santa Barbara County Census Indicators Having +80 Tract Percentile Rank

Census Tract	% In Poverty	Population in Poverty	Census Tract	% Hispanic	Hispanic Population	Census Tract	% No Vehicle Available	Workers in Hslds No Vehicle Available	Census Tract	% No H.S. Education	25+ No H.S. Education	Census Tract	% English not Spoken Well	Hslds No English Spoken Well
29.24	88	5,130	24.03	92	6,246	11.02	24	591	24.04	71	5,546	24.03	47	3,194
29.28	83	3,376	23.04	90	6,012	9	15	218	24.03	69	4,727	24.04	39	3,058
24.04	82	6,403	24.04	90	6,981	8.04	14	525	23.04	64	4,306	25.02	31	2,277
24.03	81	5,501	23.03	88	5,980	12.06	14	339	23.05	61	4,579	27.02	30	2,248
29.26	80	4,288	23.05	88	6,642	21.01	14	192	29.24	57	3,342	23.04	30	1,993
27.06	68	4,117	25.02	85	6,251	22.06	13	248	23.03	57	3,870	23.05	26	1,972
23.04	67	4,513	8.01	75	3,060	27.08	11	115	25.02	56	4,091	23.03	23	1,576
27.02	66	4,867	11.02	75	3,560	17.04	10	189	24.02	48	5,463	22.05	23	1,154
24.02	64	7,335	24.02	74	8,440	27.06	10	211	27.06	43	2,573	24.02	22	2,452
12.06	61	2,740	22.09	74	2,448	10	9	267	11.02	42	2,000	22.06	19	918
23.05	60	4,513	27.02	73	5,384	29.15	8	26	27.02	42	3,099	30.01	19	1,059
22.06	56	2,695	8.04	71	5,126	12.03	7	120	22.09	42	1,388	8.04	18	1,301
22.09	56	1,868	22.05	70	3,513	24.04	7	219	22.05	39	1,924	27.06	18	1,066
23.03	56	3,805	27.06	67	4,056	20.06	7	84	8.01	38	1,522	11.02	17	811
22.05	54	2,703	22.06	66	3,142	29.24	7	146	22.06	37	1,765	11.01	17	801
11.02	54	2,548	23.06	65	5,727	21.03	6	97	29.28	36	1,464	22.09	15	511
27.05	53	2,239	22.1	63	3,814	27.05	6	102	12.06	34	1,541	12.06	15	650
27.03	52	2,180	21.01	62	2,417	29.14	5	94	27.05	34	1,436	8.01	14	572

Source: 2010 Census and 2006-2010 ACS

Poverty: Percent of population living below two times the federal poverty level.

Hispanic: Percent of population that is Hispanic Origin.

No Vehicles Available: Percent of workers in households without a vehicle.

Education: Percent of population over 25 with less than a high school education.

English not Spoken Well: Percent households in which no one 14 and over speaks English "very well".

B. CalEnviroScreen Indicators

Per CalEnviroScreen, no tracts within Santa Barbara County have combined Pollution Burden and Population Characteristics profile score over 80 (which is the proposed cut-off for recognizing disadvantaged populations). Thus, if the CalEnviroScreen analysis is to be believed, Santa Barbara County has no disadvantaged populations at all.

Individual Population Characteristics and Pollution Burden Indicator Scores over 80 Percentile and Tracts' Total Population

CalEnviroScreen Indicator	Indicator Descriptions	Pop. and % of Countywide Pop. in Impacted S.B. County Tracts
Drinking Water	Toxicity-weighted drinking water quality index for selected contaminants	26,492 (6.2%)
Pesticides	Total pounds of selected active pesticide ingredients (filtered for hazard and volatility) used in production-agriculture per square mile in the census tract	163,407 (38.5%)
Cleanup Sites	Cleanup sites, sum of weighted EnviroStor cleanup sites within buffered distances to populated blocks of census tracts	46,970 (11.0%)
Groundwater Threats	Groundwater threats, sum of weighted GeoTracker leaking underground storage tank sites within buffered distances to populated blocks of census tracts	128,561 (30.3%)
Haz. Waste	Sum of weighted hazardous waste facilities and large quantity generators within buffered distances to populated blocks of census tracts	40,968 (9.7%)
Imp. Water Bodies	Impaired water bodies, sum of number of pollutants across all impaired water bodies within buffered distances to populated blocks of census tracts	75,547 (17.8%)
Age	Percent of population under age 10 and over age 65	131,573 (31.0%)
Low Birth Weight	Percent low birth weight	25,190 (5.9%)
Education	Percent of population over 25 with less than a high school education	99,640 (23.0%)
Linguistic Isolation	Percent households in which no one 14 and over speaks English "very well" or speaks English only	71,544 (16.9%)
Poverty	Percent of population living below two times the federal poverty level	91,910 (21.7%)
Unemployment	Percent of the population over the age of 16 that is unemployed and eligible for the labor force	40,000 (9.4%)

Source: CalEnviroScreen percentile range tract database sorted by +80 scores for individual indicators with tract population totals and % of Countywide population. Note that the population estimates are the total for the tract, not of the specified indicator, for example, the number of those living below poverty level.

Population Characteristics Overall Tract Score over 80 Percentile and Individual Indicator Scores

Jurisdiction	Tract	Tract Pop.	Overall Score	Age Score	Asthma Score	Birth Rate Score	Education Score	Linguistic Score	Poverty Score	Unemployment Score
Santa Maria	22.09	3,321	85	55	68	45	87	72	81	88
Santa Maria	22.05	4,997	97	90	68	98	84	86	79	77
Santa Maria	22.06	4,782	82	93	68	49	82	80	82	30
Santa Maria	22.01	3,873	82	75	68	59	72	54	66	90
Santa Maria	21.03	3,903	82	87	67	51	70	65	75	69
Santa Maria	22.04	7,800	95	75	30	75	100	97	99	81
Santa Maria	24.03	6,811	81	73	30	6	100	99	99	75
Santa Maria	23.04	6,687	89	79	30	83	99	93	92	41
Lompoc	27.06	6,054	92	74	42	67	88	77	93	95

Source: CalEnviroScreen percentile range tract database for sorted by +80 overall scores for Pop. Characteristics only. Note that there are no Pollution Burden overall indicator scores with +80.

C. Statewide “Disadvantaged Communities”

Much of the state is excluded by the proposed CalEPA approach. Only the top 20% of census tracts on CalEPA’s weighted scoring system are recognized as having any disadvantaged communities. Here is a list of California counties entirely excluded:

Counties Excluded from Disadvantaged Communities Identification

Alpine	Lassen	San Luis Obispo
Amador	Marin	Santa Barbara
Butte	Mariposa	Santa Cruz
Calaveras	Mendocino	Shasta
Colusa	Modoc	Sierra
Del Norte	Mono	Siskiyou
El Dorado	Napa	Sonoma
Glenn	Nevada	Sutter
Humboldt	Placer	Tehama
Inyo	Plumas	Trinity
Lake	San Benito	Tuolumne

The proposed CalEPA approach results in regional geographic inequity because these areas, like SB County, actually do have populations that should, by rights, be recognized as disadvantaged.

CalEnviroScreen is highly selective and results in an inequitable identification of disadvantaged populations. Only 25 counties (43%) have populations that would qualify as “disadvantaged.”

Indicators Statewide Population Coverage for +/- 80 Percentile Scores

Indicators	Population Above 80%	Percent of Total	Population Below 80%	Percent of Total	Total
CalEnviroScreen Overall	7,498,607	20%	29,672,341	80%	37,170,948
Pollution Burden Overall	7,629,705	20%	29,624,251	80%	37,253,956
Ozone	2,888,458	71%	1,185,670	29%	4,074,129
PM2.5	7,468,169	20%	29,434,702	80%	36,902,871
Diesel PM	6,630,492	18%	30,623,464	82%	37,253,956
Drinking Water	8,253,829	22%	28,903,984	78%	37,157,813
Pesticides	3,267,065	9%	33,986,891	91%	37,253,956
Toxic Release	7,630,081	20%	29,623,875	80%	37,253,956
Traffic	7,288,024	20%	29,965,932	80%	37,253,956
Cleanup Sites	5,008,175	13%	32,245,781	87%	37,253,956
Groundwater Threats	5,863,283	16%	31,390,673	84%	37,253,956
Hazardous Waste	5,069,621	14%	32,184,335	86%	37,253,956
Impaired Water	4,703,142	13%	32,550,814	87%	37,253,956
Solid Waste	3,376,823	9%	33,877,133	91%	37,253,956
Pop. Characteristics Overall	7,550,748	20%	29,703,208	80%	37,253,956
Age	2,186,244	24%	7,097,569	76%	9,283,813
Ashma	7,342,777	20%	29,911,179	80%	37,253,956
Low Birth Weight	449,698	24%	1,450,286	76%	1,899,984
Education	3,593,678	48%	3,954,913	52%	7,548,591
Poverty	4,820,087	37%	8,236,998	63%	13,057,084
Unemployment	6,519,298	35%	12,029,160	65%	18,548,459
Race Characteristics Overall	7,498,607	20%	29,672,341	80%	37,170,948
Hispanic	5,006,046	36%	8,977,307	64%	13,983,354
White	1,065,776	7%	13,866,802	93%	14,932,578
African	610,886	29%	1,529,904	71%	2,140,790
Native Am.	23,969	15%	137,240	85%	161,210
Asian	677,010	14%	4,224,370	86%	4,901,380
Other	114,658	11%	936,628	89%	1,051,286

Source: CalEnviroScreen percentile range tract database sorted by +/- 80 score with population totals.

D. Other Possible, More Equitable Measures

More equitable and objective measures (based on straight Census data) might include the following:

- Low Income
- Minority
- Households without a Vehicle
- Persons Over 25 without a HS Diploma
- Households Where English is Not Spoken Well

As shown above, these measures result in a more equitable, common sense identification of “disadvantaged communities.”

In addition to the measures listed above, other possible measures that address the relationship between AB 32 goals of GHG reduction and the SB 535 goals of benefitting disadvantaged communities include the following:

- Housing costs relative to income (paying over 30% of income to rent)
- Home ownership rate
- Vacancy rate
- Travel time
- Jobs/housing relationship.

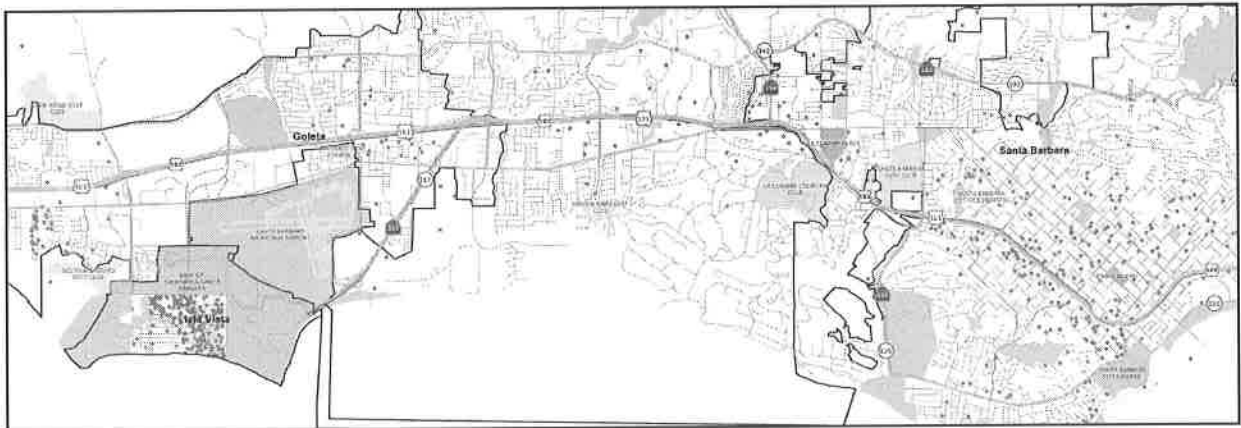
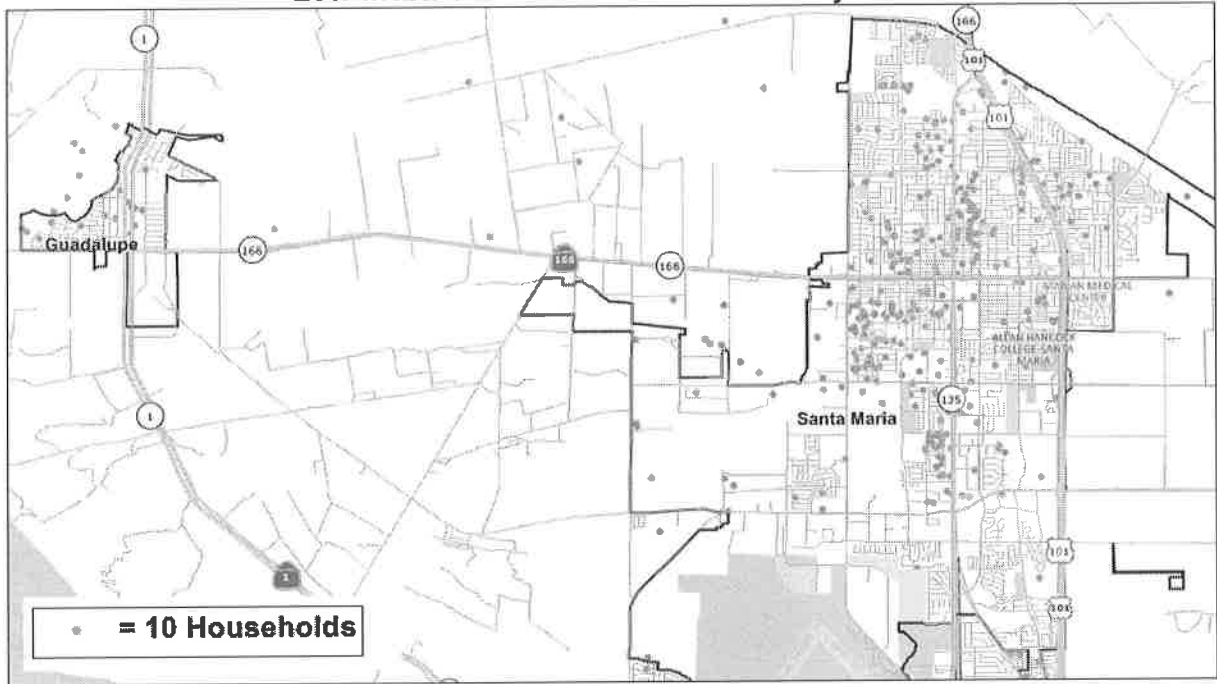
A relevant measure from UC Davis Center for Regional Change identifies places with significant shortages of affordable housing for the low-wage workers employed in those places. The analysis provides a ratio of low-wage jobs to affordable housing units for Census Places in the State of California. A tract-level analysis has been completed. The link to their site is:

<http://mappingregionalchange.ucdavis.edu/jobshousingfit2011?keys=&page=1>

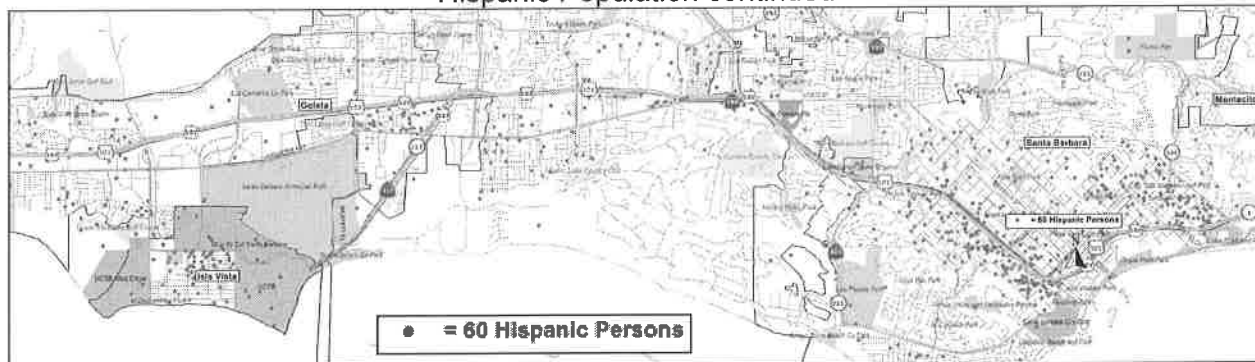
Place Name	Low-Wage	95%CI	Affordable Rental	Total Jobs	Total Jobs	Affordable	Affordable	All	All Housing	Percent	
	Jobs-Housing	Margin of	(Deficit) or Surplus			Low-wage Jobs	Rental Units				Owned Units
	Fit Ratio	Error JHFIT	(to reach JHFIT	Balance Ratio	Total Jobs	(<\$1250/mo)	(<\$750/mo)	(<\$150,000)	Units	Units	Housing
		Ratio	Ratio of 2.00)								
Ballard CDP	2.62	16.98	(7)	1.25	188	55	21	-	21	150	14.0%
Buellton city	2.85	1.34	(93)	1.41	2,300	621	218	175	393	1,626	24.2%
Carpinteria city	2.76	0.94	(156)	1.09	5,873	1,133	411	251	662	5,396	12.3%
Casmalia CDP	0.09	0.68	11	0.02	1	1	11	11	22	54	40.7%
Goleta city	7.28	1.73	(1,191)	1.79	20,280	3,284	451	394	845	11,306	7.5%
Guadalupe city	1.57	0.60	64	0.76	1,448	459	293	159	452	1,907	23.7%
Isla Vista CDP	2.65	1.29	(126)	1.15	6,047	1,029	389	13	402	5,274	7.6%
Lompoc city	0.86	0.09	1,711	0.60	8,124	2,597	3,009	990	3,999	13,641	29.3%
Los Alamos CDP	0.39	0.37	78	0.19	101	38	97	51	148	527	28.1%
Los Olivos CDP	5.36	15.95	(61)	1.50	677	193	36	10	46	450	10.2%
Mission Canyon CDP	5.08	53.05	(20)	0.21	190	66	13	-	13	921	1.4%
Mission Hills CDP	4.33	10.50	(14)	0.10	120	52	12	44	56	1,230	4.6%
Montecito CDP	3.18	1.82	(143)	1.05	3,530	772	243	46	289	3,347	8.6%
New Cuyama CDP	0.19	0.20	70	0.17	33	15	77	60	137	196	69.9%
Orcutt CDP	2.76	0.35	(202)	0.38	4,114	1,465	531	1,021	1,552	10,839	14.3%
Santa Barbara city	5.41	0.68	(4,664)	1.38	50,549	14,804	2,738	493	3,231	36,564	8.8%
Santa Maria city	3.32	0.25	(2,127)	1.30	36,432	10,709	3,228	2,032	5,260	27,970	18.8%
Santa Ynez CDP	27.50	175.81	(204)	1.58	2,854	440	16	5	21	1,805	1.2%
Sisquoc CDP	1.63	26.77	2	1.05	69	13	8	2	10	66	15.2%
Solvang city	8.93	7.98	(333)	1.23	2,793	857	96	78	174	2,268	7.7%
Summerland CDP	4.75	25.62	(44)	1.06	714	152	32	-	32	672	4.8%
Toro Canyon CDP	2.03	3.24	(2)	1.35	884	195	96	-	96	657	14.6%
Vandenberg AFB CDP	0.32	0.15	373	1.95	2,158	141	443	-	443	1,104	40.1%
Vandenberg Village CDP	16.15	52.58	(92)	0.28	753	210	13	38	51	2,693	1.9%

Attachment 1, Locations of Low-Income, Minority and Disadvantaged Populations

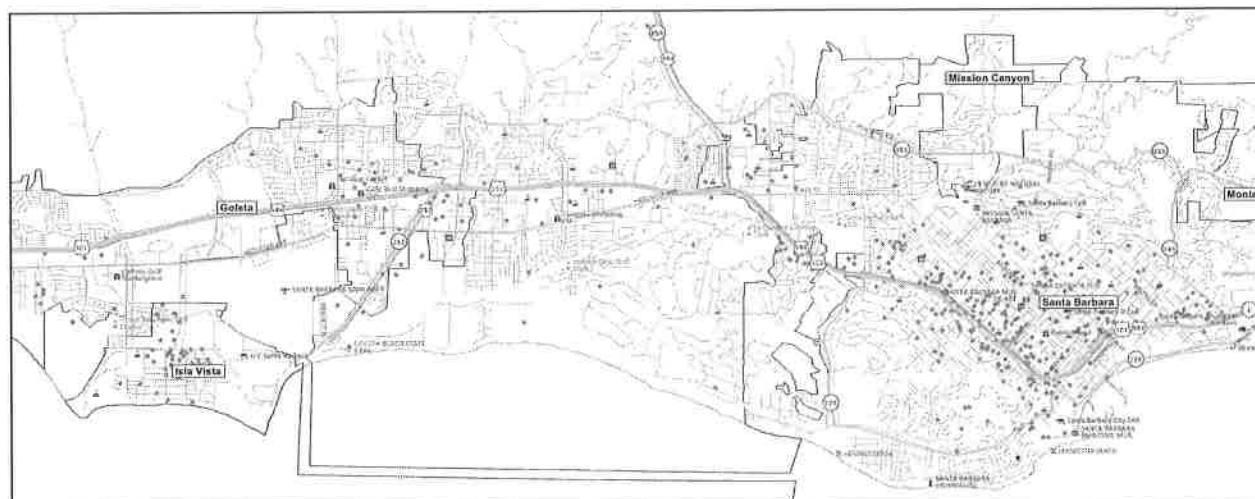
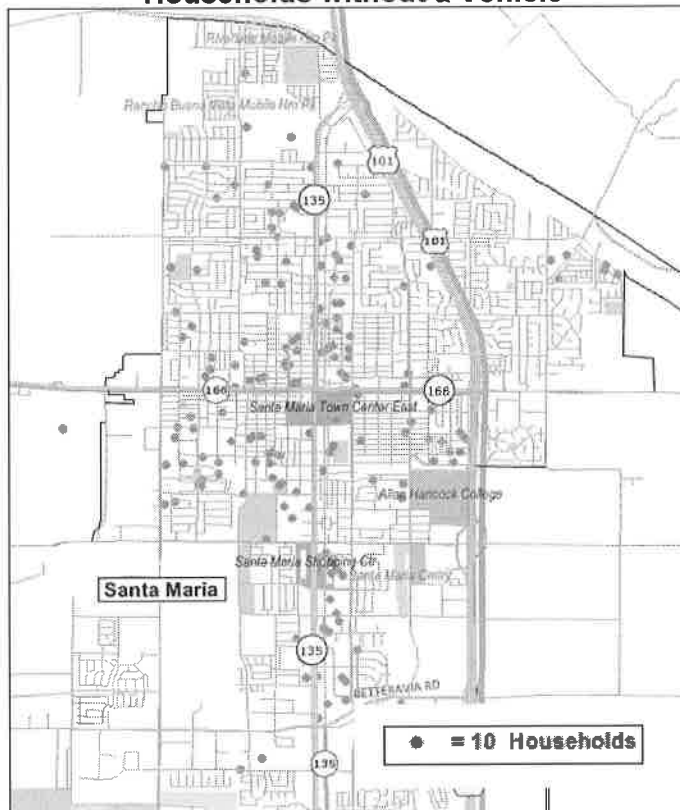
Low-Income Households below Poverty Level



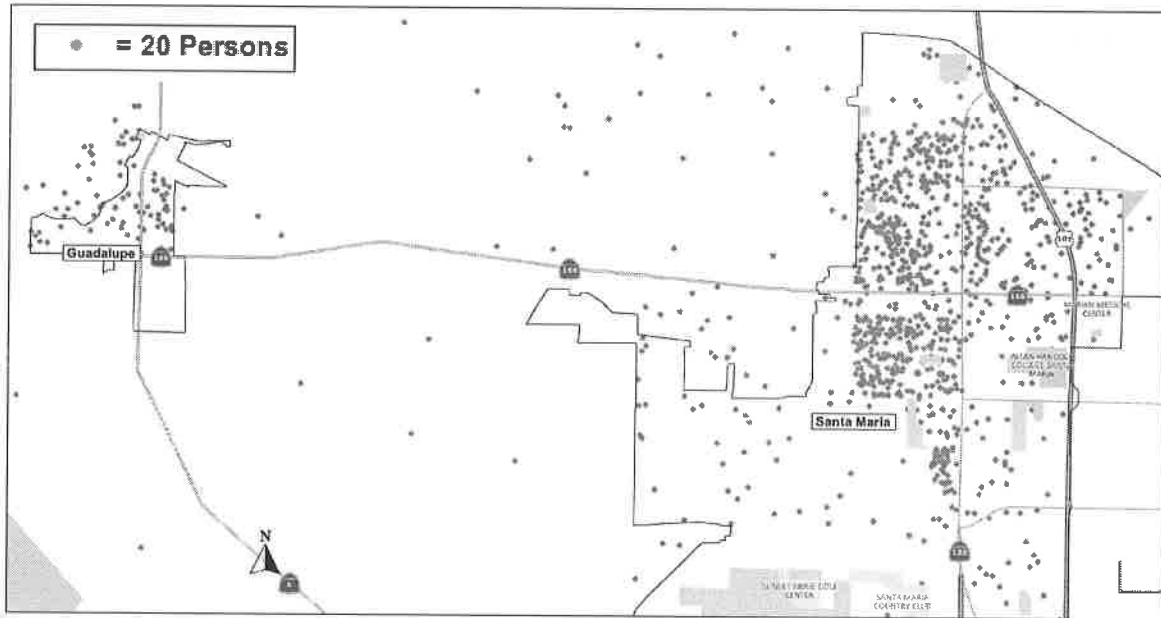
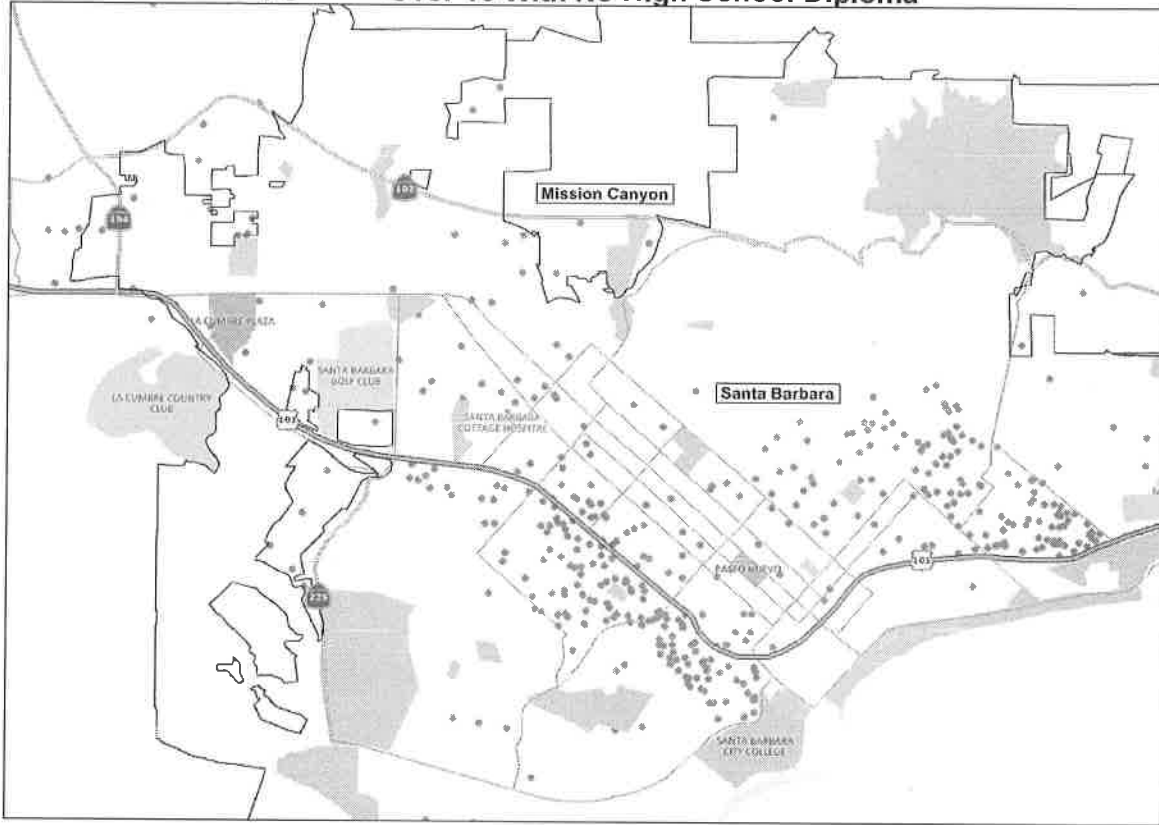
Hispanic Population continued



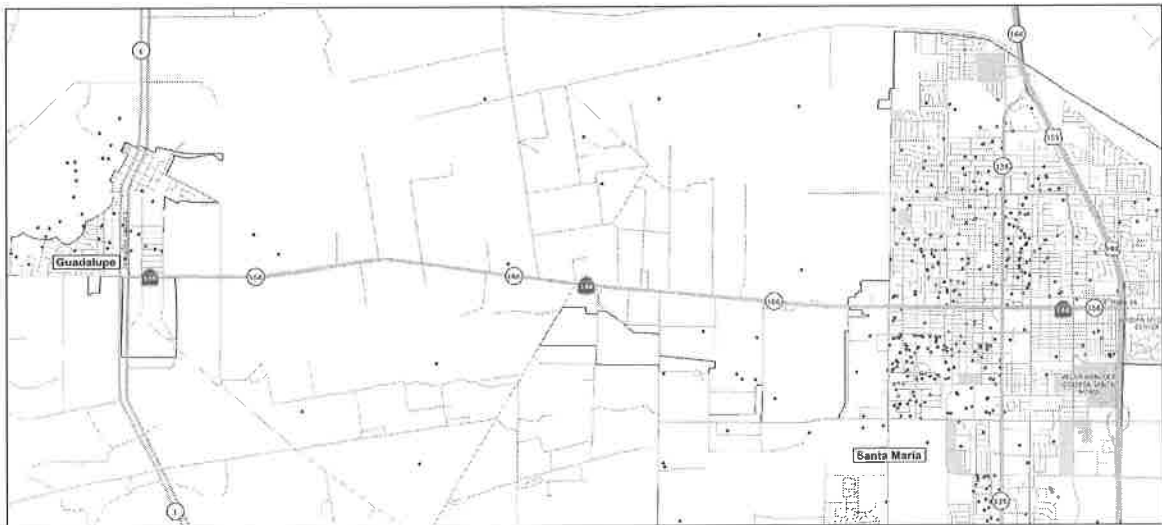
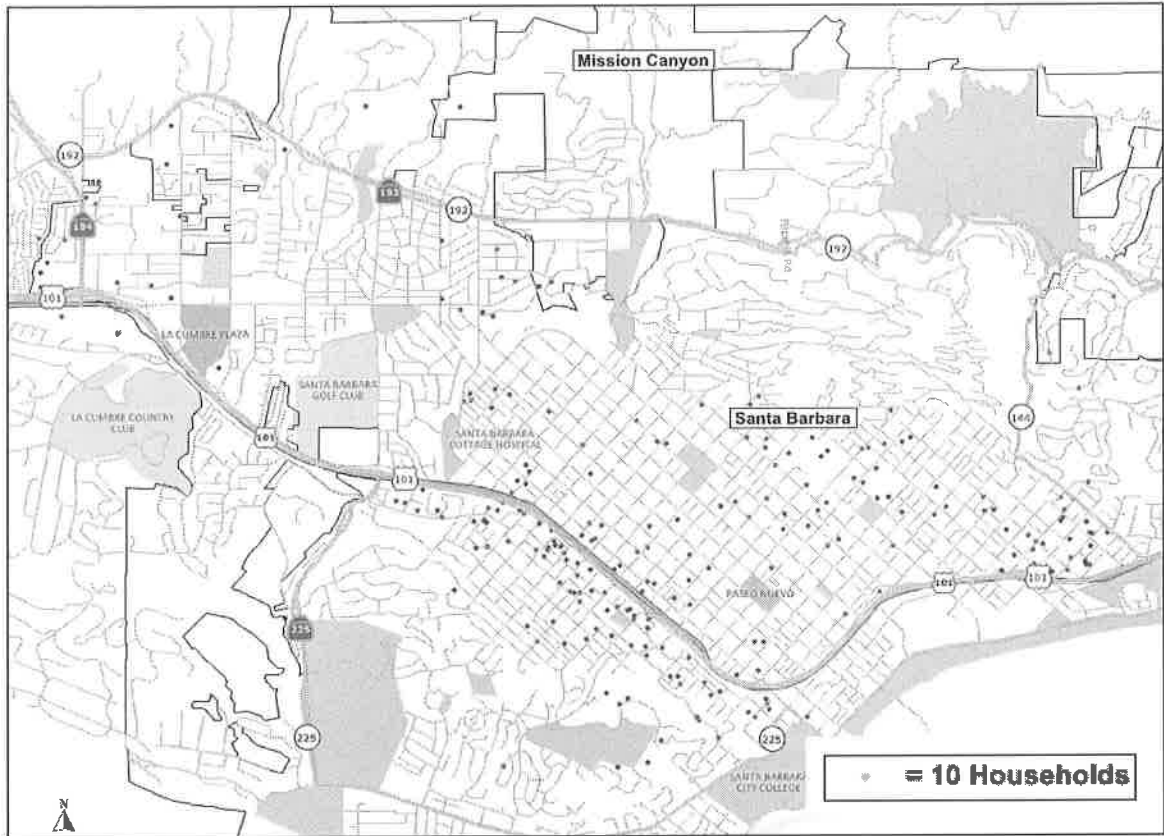
Households without a Vehicle



Persons Over 16 With No High School Diploma



Households Where English Not Spoken Well



Source: 2010 Census

