



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

September 12, 2014

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

**RE: Draft Interim Guidance to Agencies Administering Greenhouse Gas Reduction Fund Monies: Investment to Benefit Disadvantaged Communities**

Dear Mr. Corey:

The Rural County Representatives of California (RCRC) represents thirty-four rural counties across California. Our Board of Directors is comprised of one elected Supervisor from each member county. Our 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 Draft Interim Guidance to Agencies Administering Greenhouse Gas Reduction Fund Monies: Investment to Benefit Disadvantaged Communities, and the use of CalEnviroScreen for this purpose.

RCRC is concerned 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:

- (a) 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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(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.

CalEnviroScreen also does not consider the short term carbon emissions from catastrophic wildfires in scoring communities. As you know, California's forested communities are being plagued by pervasive wildfire due to the drought. These communities are facing short term rampant air pollution, including greenhouse gases (GHGs) and criteria pollutants, yet these emissions are not considered in CalEnviroScreen.

The CalEPA/OEHHA's Approaches to Identifying Disadvantaged Communities acknowledges that several Methods exclude two of the nine regions from being identified as having disadvantaged communities, the North State representing 16 counties, and the Southern Sierra with another three counties. Method 1 appears to eliminate at least 24 of the RCRC counties from the disadvantaged communities GGRF monies. It is unfathomable that every county in the State cannot point to a specific area within their jurisdiction that is a "disadvantaged community." Using strictly the CalEnviroScreen as a source for recognition could potentially eliminate a minimum of 19 counties, including counties such as Lake, Modoc, Plumas, and Lassen. If you have been to these counties, you would be hard pressed to agree they do not have disadvantaged areas.

Rural areas cannot compete in many of the AB 32 programs since they cannot demonstrate the "biggest bang for the buck." Being denied access to the "disadvantaged community" designation eliminates these counties from access to the funds. There are many local programs that can benefit GHG reductions in rural areas as well. The residents in every county will be contributing to payments into the GGRF, especially when fuels are added into the Cap and Trade Program. These residents should also receive a direct benefit by having some GGRF money allocated to each county or at least on a regional basis.

RCRC also believes that the ARB should keep the pollution burdens separate from the population characteristics, allowing the top scores from both Methods 2 and 3. In addition, there should be a mechanism to allow a local jurisdiction to demonstrate how a community, smaller than a census tract, can meet the definition of a disadvantaged community. We look forward to having the opportunity to receive some direct benefit from the GRRF monies.

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Again, thank you for this opportunity to provide input into this important process. If you have any questions or wish to have further discussions, please do not hesitate to contact me at (916) 447-4806.

Sincerely,

A handwritten signature in black ink that reads "Mary Pitto". The signature is fluid and cursive, with the first name "Mary" and the last name "Pitto" clearly legible.

MARY PITTO  
Regulatory Affairs Advocate

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