

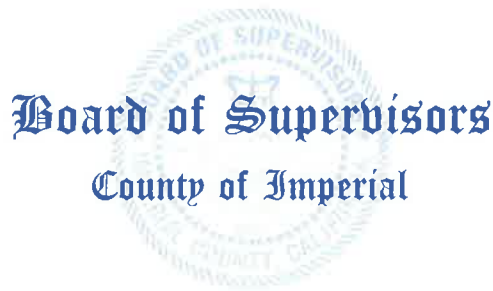
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JOHN R. RENISON

DISTRICT 2
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September 9, 2014

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814

Re: Cap-and-Trade Auction Proceeds

Dear Honorable Board of Directors:

Please accept this letter as the County of Imperial's comments on the Interim Guidance process that ARB is currently conducting in relation to the Cap-and Trade Auction Proceeds for Investments to benefit Disadvantaged Communities. We have reviewed information available from a number of sources, including that provided during a series of workshops recently held on this subject. We have some serious concerns, based on some of the scenarios under consideration that Imperial County might be left in a position of having limited access to funding under this program.

We believe, given the intent of SB 535, that the Greenhouse Gas Reduction Fund be allocated to projects that benefit Disadvantaged Communities (DAC's), and the fact that Imperial County meets every qualifying criteria as a DAC, that any program designed to meet the goals of SB 535 should result in significant funding being made available to counties such as Imperial. It is difficult for us to imagine that any county with the unfortunate demographic profile, and the serious air, water and other pollution issues confronting our residents might be disqualified from consideration, or held at a competitive disadvantage when seeking these funds.

In addition, we are aware that the California Air Pollution Control Officers Association (CAPCOA), and other organizations, have raised concerns with the CalEnviroScreen modeling tool being used to implement these funding decisions. We agree with CAPCOA on the need to include the most recent verifiable data available, and that appropriate weighting of various evaluation factors should be taken into account. Understanding that the tool will continually evolve, other factors should be considered now before this tool moves forward; such as, proximity to border. Imperial County is bordered to the South by the urban city of Mexicali Mexico which has been proven to contribute to Imperial County's inability to meet the NAAQS for PM10, PM2.5, and Ozone, as well as polluted waterways (The New and Alamo Rivers) that begin south of the border in Mexico and flow north to their repository of The Salton Sea – California's largest inland body of water.

We therefore urge the California ARB and CalEPA to seriously consider our concerns, and to design this important program in a manner that ensures access to funding for those residents of California whom are most in need of assistance in overcoming the environmental challenges they face. We look forward to

working with you to address these concerns, and if we can provide you with any additional information, please contact our County Executive Officer, Ralph Cordova, Jr., at (760) 482-4290.

Thank you.

Sincerely,



John R. Renison, Chairman
Imperial County Board of Supervisors

cc: Richard Corey, Executive Officer, CARB
Matt Rodriguez, Secretary, CalEPA