



September 15, 2014

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

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

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 for Monterey, San Benito, and Santa Cruz Counties the Association of Monterey Bay Area Governments (AMBAG) is interested in providing feedback for disadvantaged populations in the region we serve.

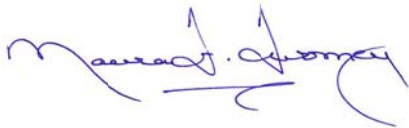
On behalf of our constituents in Monterey, San Benito, and Santa Cruz Counties, we are writing to express concern about the approaches recently proposed by the California Environmental Protection Agency and California Air Resources Board to identifying "disadvantaged communities" and benefits to these communities for purposes of allocating Cap & Trade program revenues. The proposed methods leave out deserving disadvantaged populations around the state and result in geographic inequity.

Upon initial review of the CalEnviroScreen 2.0 tool the AMBAG geographic region shows only small pockets of disadvantaged areas in the Southern portion of Salinas, Pajaro, and edges of Watsonville. Very large areas of our disadvantaged region in rural areas of Salinas Valley have been left out such as Chualar, Greenfield, Gonzales, Soledad, and King City; in addition to coastal disadvantaged areas of Seaside and Santa Cruz do not even come close to ranking using the current method and percentages. Given a difficult choice among current methodology proposed, AMBAG would support Method 4 for our region with significant hesitation as no other option seems to be equitable for our area. Method 4 the "equal cutpoint" option focuses the standard CalEnviroScreen 2.0 more on the highest risk areas and

excludes areas below average for pollution and population characteristic score. We believe that Method 4 seems to be the best of the provided options, as it would be fair balance between pollution impacts and disadvantaged population characteristics with a good starting point for the Affordable Housing and Sustainable Communities program by excluding the lowest scoring census tracts. Outside of Method 4 being selected as the agency provided option, AMBAG would also be interested in exploring the option called "Method 6" as proposed by David M. Holstius, PH.D from the Bay Area Air Quality Management District. Method 6 includes more of the rural and disadvantaged areas in the AMBAG region and follows closely to our identified disadvantaged areas. In conclusion, AMBAG is also open to other options that allow other reasonable alternatives to defining disadvantaged communities besides our previously mentioned and hesitant support of Method 4 or 6.

Thank you in advance for considering our comments.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Maura Twomey". The signature is fluid and cursive, with a prominent loop at the end.

Maura Twomey
Executive Director