

Submitted electronically at

https://www.arb.ca.gov/lispub/comm2/bcsubform.php?listname=ab1550meetingsws&comm_period=1

February 14, 2017

Re: Request to Include "Cross-Hatched Areas" as Disadvantaged Communities

To CalEPA:

The Port of Long Beach (Port) appreciates the opportunity to comment on CalEPA's proposal for identifying disadvantaged communities for Greenhouse Gas Reduction Funds. The Port strongly encourages CalEPA to designate as "disadvantaged" the census tracts that score in the highest 20% of pollution burden but have a low population or the socioeconomic or health data are unreliable. These "cross-hatched areas" are referenced on page 6 of the February 2017 concept paper, "Identifying Disadvantaged Communities."

The Port complex falls within this cross-hatched area. If these census tracts are not designated as disadvantaged communities, the Port will be ineligible to apply for a significant portion of Cap-and-Trade funds per AB 1550. The lack of funding could seriously impede the Port's progress to eliminate operational emissions by investing in and advancing new technologies. Contrary to the State's goal, CalEPA's proposal, as written, could negatively impact near-Port disadvantaged communities.

To truly benefit disadvantaged communities by accelerating the transition to zero-emissions goods movement, the Port must be able to access Cap-and-Trade funds. Thus, the Port reiterates its strong support of including the cross-hatched areas as "disadvantaged communities."

Thank for your consideration of our request.

Sincerely,

Heather A. Tomley

Director of Environmental Planning

Port of Long Beach

City of Long Beach Harbor Department