

September 15, 2014

Matthew Rodriquez, Secretary  
California Environmental Protection Agency (CalEPA)  
1001 I Street  
P.O. Box 2815  
Sacramento, CA 95812

Subject: CalEPA Identification of Disadvantaged Communities

Dear Secretary Rodriquez:

Thank you for the opportunity to provide comments on the identification of disadvantaged communities (DACs) for state agencies administering Greenhouse Gas Reduction Fund monies. The San Francisco County Transportation Authority (Transportation Authority) serves as the Congestion Management Agency for San Francisco, is responsible for long-range transportation planning for the City, and administers over \$100 million in grant funding every year. We respectfully submit the following comments for your consideration.

While we strongly support the goal of investing cap and trade funds in and for the benefit of DACs, we are very concerned about the use of CalEnviroScreen 2.0 or any of the other four proposed scenarios to define DACs, which **we feel will not accurately capture DACs in urban areas**. For instance San Francisco's Bayview Hunters Point, vulnerable community that has documented environmental and health issues (e.g. high asthma rates), is not identified as a DAC. While it holds great promise as a tool, the CalEnviroScreen has not yet been sufficiently vetted to be used in something as important as the distribution of almost a billion dollars in statewide cap and trade revenue, something it was not specifically designed to do.

To meet the intent of SB 535 (DeLeon), the CalEnviroScreen tool must be updated to address the factors named in the bill that are not currently included. Specifically, **indicators of high rent burden and low levels of home ownership**, which were both called out in SB 535, must be considered in identifying DACs. We also strongly feel that **poverty indicators should be adjusted to account for different costs of living** from region to region.

**The definition of DACs should also consider the magnitude of individual factors, not only the combined score.** This would allow the identification of outliers - areas with extremely high indicators in one or two areas but not across all nineteen. For instance, an area disadvantaged by a very high PM 2.5 concentration and a high level of poverty should not be excluded because it has relatively clean drinking water and is not located near a solid waste facility. This could be accomplished in part by using a straight multiplication of the indicators (all scaled from 1 (disadvantaged) to 0 (not disadvantaged)) and/or increasing the threshold to 30%. **We support the Option 6 that has been proposed by the Bay Area Air Quality Management District which we feel provides a more equitable snapshot of DACs in the state.**

Finally, **all indicators should have complete data in order to factor into the definition of DACs.** For example, the pesticide use factor does not take into consideration urban exposure due to lack of data – unfairly disadvantaging urban areas - and should not be



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used.

Until these shortfalls of CalEnviroScreen are addressed, CalEPA should either 1) **delay adoption to allow refinement of the tool or 2) if moving forward now, publish a list of named DACs but allow jurisdiction to submit documentation of why a project located outside a named DAC may still provide tangible benefits to disadvantaged populations.** The recent Active Transportation Program fund distribution successfully utilized this approach.

Thank you for your consideration. Please feel free to have your staff contact Amber Crabbe, Principal Planner, at 415.522.4801 with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Tilly Chang". The signature is fluid and cursive.

Tilly Chang  
Executive Director

cc: Com. Avalos, Campos, Wiener  
G. Gillett, T. Drew – Office of Mayor Edwin M. Lee  
A. Halsted – BCDC  
K. Breen, M. Webster – SFMTA  
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