



RURAL COUNTY REPRESENTATIVES  
OF CALIFORNIA

June 25, 2015

Mr. Matthew Botill  
Manager, Climate Investments Branch, Policy Section  
California Air Resources Board  
1001 I St.  
Sacramento, CA 95812

**RE: Funding Guidelines for Agencies that Administer California Climate Investments**

Dear Mr. Botill:

The Rural County Representatives of California (RCRC) is an association of thirty-four rural California counties and the RCRC Board of Directors is comprised of elected supervisors from those member counties. Our member 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 Funding Guidelines for Agencies that Administer California Climate Investments (Guidelines).

While we acknowledge that the draft Guidelines address disadvantaged communities (DACs) as they are currently defined by the California Environmental Protection Agency (CalEPA), RCRC must reiterate our opposition to using the CalEnviroScreen tool to identify DACs for distribution of any state funds, including cap and trade auction proceeds. The use of CalEnviroScreen to define DACs effectively denies twenty-nine counties any chance to receive those earmarked funds. Many of these counties contain communities that are considered DACs, some severely disadvantaged, under other widely-recognized definitions used by the State, including the definition in Section 75005 of the Public Resources Code. Rural counties also generally have fewer resources to compete against urban and suburban projects for the remaining funds not reserved for DACs, all but insuring that those communities will receive little benefit from cap and trade proceeds in the near term. RCRC recommends that ARB staff encourage CalEPA to revisit the CalEnviroScreen definition and open discussions with stakeholders to devise a more equitable way to identify DACs.

1215 K Street, Suite 1650, Sacramento, CA 95814 | [www.rcrcnet.org](http://www.rcrcnet.org) | 916.447.4806 | FAX: 916.448.3154

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RCRC is also concerned about the short time frame for public comment, particularly in light of the pending update to the Cap and Trade Investment Plan and the uncertainty as to how 40 percent of the auction proceeds will be spent in 2015-16 and beyond. While we have no objections to the basic guiding principles in the document, we believe that the very short time frame for commenting on the 175-page draft Guidelines subverts the public process and deprives stakeholders of the opportunity to give meaningful input on the proposal. Similarly, your agency is proposing a July 10, 2015 release date for the final draft Guidelines, to be taken before your Board on July 23, 2015. Ten days is not a sufficient amount of time to evaluate and weigh in on a document that will have significant impact on how billions of dollars will be spent in California. We ask that you delay presenting the Guidelines to the Board by thirty days to allow for more meaningful public comment.

If you should have any questions or concerns, or would like to discuss our comments further, please contact me at (916) 447-4806 or [sheaton@rcrcnet.org](mailto:sheaton@rcrcnet.org).

Sincerely,

A handwritten signature in black ink, appearing to read "Staci Heaton", with a stylized flourish at the end.

STACI HEATON  
Regulatory Affairs Advocate

cc: Mary Nichols, Chair, California Air Resources Board  
Richard Corey, Executive Director, California Air Resources Board  
RCRC Board of Directors