Sacramento Area Council of Governments

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SACOG

September 15, 2014

Matthew Rodriquez, Secretary
California Environmental Protection Agency
1001 I Street
Sacramento, CA 95812

Dear Mr. Rodriquez:

The Sacramento Area Council of Governments (SACOG) appreciates the opportunity
to comment on the methodology to identifiy disadvantaged communities in
implementing SB535 to utilize Cap-and-Trade proceeds to reduce greenhouse gas
emissions.

The CalEnviroScreen 2.0 model is a good source of relevant variables. However, the
model as now configured has significant disadvantages for this particular task. The
model was developed for other purposes focused on pollution mitigation programs.

These recommendations propose two types of modifications of the methodology that
would improve the tool. The first type of modification is to remove variables. The
other change is to weigh the population variables higher than the pollutant variables in
the final step where they are now multiplied to get a final score.

Removing Variables

The pesticides variables should be deleted because by definition it only affects a small
part of the state population. The state program that provides data for this variable is
for agriculture production pesticides. More than 60% of state population is not
covered by the program. The CalEnviroScreen methodology ignores any variable that
a census tract does not include, so the variable is already ignored by most of the state.
As a matter of fairness in designating disadvanteaged communities, it should be
excluded.

The ozone variable should be deleted because the pollutant and the method of data
collection are aimed at areas much larger than communities/census tracts. Ozone is a
regional pollutant at the air basin scale. The data is collected from monitoring
stations, which are not numerous enough and not distributed uniformly to be a good
source of community evaluation.

One of most significant effects of ozone is asthma, which is a variable on the
population side of the methodology. Therefore, ozone concentrations are not ignored
in the overall evaluation.

There are other pollution variables which have a high percentage of the state not
included in the scoring. However these other pollutants are not included because there
are no sources in or near the census tracts and not because the program that collects
the data systematically ignores them.

Weighing Population Higher Than Pollution

The issue here is that the Cap and Trade funding programs have the well-being of the community residents as the primary objective, not the elimination or mitigation of pollution. In order to fit the CalEnviroScreen's capabilities to the objective, the recommendation is to weigh the population set of variables at twice the pollution set of variables.

Thank you for the opportunity to comment on the SB535 analysis metrics. SACOG looks forward to actively participating in the use of Cap-and-Trade funds to improve disadvantaged communities and reduce greehhouse gases.

Sincerely,

Mike McKeever
Chief Executive Officer

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