



October 12, 2016

Carolyn Flowers
Office of Environmental Health Hazard Assessment
P. O. Box 4010
Sacramento, California 95812-4010

SUBJECT: AMBAG Comments on CalEPA's Draft CalEnviroScreen 3.0 Tool

Dear Ms. Flowers:

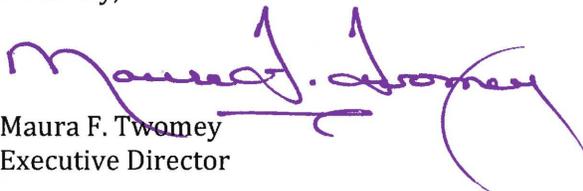
Thank you for the opportunity to comment on the California Environmental Protection Agency's (CalEPA) draft CalEnviroScreen 3.0 tool. As the Metropolitan Planning Organization for Monterey, San Benito and Santa Cruz Counties, the Association of Monterey Bay Area Governments (AMBAG) is interested in providing 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 CalEnviroScreen 3.0 tool used by CalEPA and the California Air Resources Board to identifying "disadvantaged communities" and benefits to these communities for purposes of allocating Cap & Trade program revenues. The CalEnviroScreen tool leaves out deserving disadvantaged populations around the state and result in geographic inequity and focuses too much on air pollution as the predominant indicator of disadvantages communities.

Upon review of the new CalEnviroScreen 3.0 tool, the AMBAG region shows only two small disadvantaged areas in Salinas and Pajaro, compared to four disadvantaged communities identified using the CalEnviroScreen 2.0 tool. We believe this is due to the additional indicators added to CalEnviroScreen 3.0 tool related to air pollution. 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, Watsonville and Santa Cruz do not even come close to ranking as disadvantaged using the current tool and percentages.

AMBAG does not support the use of the CalEnviroScreen 3.0 tool as it is not reflective of the extreme disadvantaged communities in the AMBAG region and relies too heavily on air pollution as the predominant indicators of a disadvantaged community and does not reasonably incorporate other realistic socioeconomic factors and other toxins such as pesticides. The CalEnviroScreen 3.0 tool needs to be modified to include these key characteristics of disadvantaged communities and should not be so heavily focused simply on air quality metrics.

Sincerely,



Maura F. Twomey
Executive Director