



October 21, 2016

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

SUBJECT: Central Coast Coalition 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. The Central Coast Coalition would like to submit comments on the draft CalEnviroScreen 3.0 tool. The Coalition consists of the regional transportation planning agencies in San Benito, Santa Cruz, Monterey, San Luis Obispo, and Santa Barbara counties and the Association of Monterey Bay Area Governments. The Coalition is interested in providing feedback for disadvantaged populations in the region we serve.

On behalf of our constituents in Monterey, San Benito, San Luis Obispo, Santa Barbara 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.

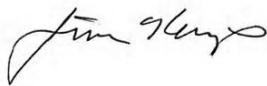
Upon review of the new CalEnviroScreen 3.0 tool, the AMBAG region shows only two small disadvantaged areas in Salinas and Pajaro, compared to four disadvantaged communities identified using the CalEnviroScreen 2.0 tool. In the Santa Barbara region, the new tool identifies no disadvantaged communities whatsoever (down from a single disadvantaged community based on CalEnviroScreen 2.0). We believe this is due to the additional indicators added to CalEnviroScreen 3.0 tool related to air pollution. In the AMBAG region, very large disadvantaged areas 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 that do not even come close to ranking as disadvantaged using the current tool and percentages. In the Santa Barbara region, disadvantaged populations especially in Santa Maria, Guadalupe and Lompoc, as well as within the City of Santa Barbara are not identified. In the San

Luis Obispo region, the new tool identifies no disadvantaged communities. However, in one or more metrics, several San Luis Obispo County tracts score among the worst twenty tracts in the state. Additionally, census tracts are poor representations of many smaller communities (population under 2,500).

The Coalition does not support the use of the CalEnviroScreen 3.0 tool as it is not reflective of the extreme disadvantaged communities in the Central Coast region. It relies too heavily on air pollution as the predominant indicator of a disadvantaged community and does not incorporate or sufficiently weight other commonsense socioeconomic factors. 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.

Thank you for your consideration of these comments and suggestions. If you have any questions, please contact Heather Adamson at the Monterey Bay Area Association of Governments at (831) 264-5086.

Sincerely,



Jim Kemp, Executive Director
Santa Barbara Association of Governments



Ron De Carli, Executive Director
San Luis Obispo Council of Governments



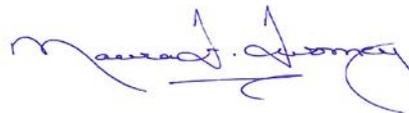
Debra L. Hale, Executive Director
Transportation Agency for Monterey County



George Dondero, Executive Director
Santa Cruz Co. Regional Transportation Commission



Mary Gilbert, Executive Director
San Benito Council of Governments



Maura Twomey, Executive Director
Association of Monterey Bay Area Governments