

COPY

The Board of Supervisors

County Administration Building
651 Pine Street, Room 107
Martinez, California 94553-1293

John M. Gioia, 1st District
Candace Andersen, 2nd District
Mary N. Piepho, 3rd District
Karen Mitchoff, 4th District
Federal D. Glover, 5th District

Contra
Costa
County



David J. Twa
Clerk of the Board
and
County Administrator
(925) 335-1900

October 18, 2016

Matthew Rodriguez, Secretary
California Environmental Protection Agency
1001 I Street
P.O. Box 2815
Sacramento, CA 95812

Dear Secretary Rodriguez:

On September 6, 2016, the California Environmental Protection Agency and Office of Environmental Health Hazard Assessment released a draft revision of CalEnviroScreen, the tool that determines which communities will be classified as "disadvantaged" for purposes of accessing Greenhouse Gas Reduction Funds. CalEnviroScreen 3.0 uses different indicators than were used in the previous version. This results in significantly fewer Northern California communities, including communities in the Bay Area, being identified as "disadvantaged communities" than previously. This in turn reduces opportunities for access to greenhouse gas reduction funds. In Contra Costa County, the number of disadvantaged communities drops from 23 to 12. Contra Costa County respectfully requests that the State adopt a different allocation methodology for cap and trade funds, and that the State direct a portion of funds back to communities located near large industrial sources that contribute through the Cap and Trade program to the Greenhouse Gas Reduction Fund.

Issues and Questions from Contra Costa County:

As the State considers the most appropriate method for allocating Greenhouse Gas Reduction Funds, Contra Costa County encourages the State to consider the following:

- Contra Costa County's CalEnviroScreen (CES) 3.0 pollution score has changed from CES 2.0 due to changes in individual factor methodology, data updates, and incorporating data from pollution sources in Northern Mexico, which impacts communities along the border. We understand the need to keep the data updated and incorporate missing environmental impacts. However, Contra Costa County continues to have a large number of stationary pollution sources that impact our residents and that contribute through the Cap and Trade program to the Greenhouse Gas Reduction Fund.

- How does climate change and sea level rise factor into the CalEnviroScreen? Anticipating adverse impacts of climate change is now recognized as critical for planning and developing adaptation strategies. The revised tool should account for factors such as sea level rise, most especially if the tidal zones in question are adjacent to either known sites of soil contamination or in proximity to disadvantaged communities identified in CES 2.0, as well as flooding and heat waves.
- Contra Costa County continues to have high asthma rates, as reflected in reported Emergency Room visits, a strong indicator of the impact of pollution sources. 18.5% of Contra Costa County residents live in Census Tracts that score 98% or above statewide for reported Asthma Emergency Room visits. The residents of Contra Costa County are experiencing the impacts of living near stationary pollution sources. A 2015 report on the economic burden of chronic disease, published by the California Department of Public Health, revealed that Contra Costa County had an estimated 154,299 cases of Asthma in 2010 with an associated cost of \$299,250,635.
- The revised CES tool does not appear to account for the potential for extreme events that create acute exposure to toxic pollutants. Chemical releases, unfortunately, do sometimes occur at large industrial facilities. The potential for such releases should be considered in defining disadvantaged communities and in allocating funds.
- The allocation methodology should direct a portion of funds back to communities located near large industrial sources that contribute to the Cap and Trade program. Six of the 28 largest stationary sources of greenhouse gas emissions in California are located in Contra Costa County.
- SB 535 (2012) directs that 25 percent of proceeds from the Greenhouse Gas Reduction Funds must go to projects that provide a benefit to disadvantaged communities, with a minimum of 10 percent directed to projects within those communities. Some State agencies are allocating the Greenhouse Gas Reduction funds at their discretion entirely to disadvantaged communities, as identified in CalEnviroScreen. For example, the Department of Community Services and Development directs weatherization funds entirely to "disadvantaged communities." This means that low-income residents who live in other census tracts are not able to benefit from weatherization programs. If CES 3.0 were to be adopted, there are communities in Contra Costa County that will not be eligible for weatherization programs, even though they are low income and within a mile of large industrial facilities. The State should ensure that Greenhouse Gas Reduction Funds are at least partially available to all low income communities, while ensuring the mandates of SB 535 are met.

Projects in Contra Costa County will be more difficult to pursue without access to Greenhouse Gas Reduction Funds:

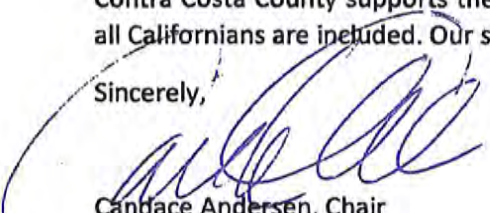
In our County, we know that projects critical to improving the quality of life for our residents will be more difficult for us to realize. These include Affordable Housing and Sustainable Communities projects in Rodeo and Bay Point, and active transportation projects in areas currently designated as "disadvantaged" for purposes of accessing Greenhouse Gas Reduction Funds. Additionally, as indicated above, Contra Costa County includes communities that are very near large industrial sources that contribute to the Cap and Trade program, yet under the new definition and the rigid manner in which some agencies interpret the funding allocations, will not receive any mitigation.

Recommendation:

Contra Costa County understands that there are many communities adversely impacted by climate change. We are concerned that under the new definition, our ability to assist communities in Contra Costa County that bear a disproportionate impact from heavy industry will be diminished. Contra Costa County encourages the State to consider an allocation methodology that directs funds to each region of the State, with each region determining how funds will be allocated. The allocation methodology should direct a portion of funds back to communities located near large industrial sources that contribute through the Cap and Trade program.

Contra Costa County supports the State's work to address climate change. The State must ensure that all Californians are included. Our staff are ready to work with CalEPA on this important matter.

Sincerely,



Candace Andersen, Chair

cc: Members, Board of Supervisors
David Twa, County Administrator
Contra Costa County Legislative Delegation