

CALIFORNIA Environmental Protection Agency



MATTHEW RODRIQUEZ Secretary for Environmental Protection 1001 I Street, Sacramento, California 95814 • P.O. Box 2815, Sacramento, California 95812-2815 (916) 323-2514 • (916) 324-0908 Fax • <u>www.calepa.ca.gov</u>

EDMUND G. BROWN JR. GOVERNOR

DESIGNATION OF DISADVANTAGED COMMUNITIES PURSUANT TO SENATE BILL 535 (DE LEÓN)

APRIL 2017

I. INTRODUCTION

California is embracing a decarbonized economy. How to meet the global threat of climate change, while improving conditions throughout the state in communities over-burdened by pollution, socioeconomic, and health impacts, is one of our greatest challenges. One of our best opportunities to meet this challenge is to direct climate investments to disadvantaged communities.

The California Environmental Protection Agency (CalEPA) is responsible for identifying disadvantaged communities for purposes of the Cap-and-Trade funding program. In October 2014, after a series of public workshops, the Agency designated as disadvantaged communities the 25% highest scoring census tracts using results of the California Communities Environmental Health Screening Tool Version 2 (CalEnviroScreen 2.0).

Early this year, the Office of Environmental Health Hazard Assessment (OEHHA) released CalEnviroScreen 3.0. This version of CalEnviroScreen incorporates more recent data for nearly all of its indicators, adds two indicators and improves the way some indicators are calculated to better reflect environmental conditions and a population's vulnerability to environmental pollutants. While the overall pattern of high-scoring census tracts across the state is similar between the 2.0 and 3.0 versions of CalEnviroScreen, the presence of the new data and results led CalEPA to reassess the identification of disadvantaged communities.

After reviewing the updated results from CalEnviroScreen 3.0 and taking into consideration previous comments and input received over the past two years, including workshops held in February 2017, CalEPA is designating the highest scoring 25% of census tracts from CalEnviroScreen 3.0 as disadvantaged communities. Additionally, 22 census tracts that score in the highest 5% of CalEnviroScreen's Pollution Burden, but do not have an overall CalEnviroScreen score because of unreliable socioeconomic or health data, are also designated as disadvantaged communities.

This document describes how CalEPA arrived at its decision to identify disadvantaged communities pursuant to SB 535 (De León, Chapter 830, Statutes of 2012). Starting in the 2017-2018 fiscal year, administering agencies approving projects using appropriation from the Greenhouse Gas Reduction Fund must use this designation of disadvantaged communities in determining how to satisfy the project funding requirements of this and related legislation.

II. STATUTORY REQUIREMENTS

In 2012, the Legislature passed and Governor Brown signed three bills into law – AB 1532 (Pérez, Chapter 807, Statutes of 2012), SB 535 (De León, Chapter 830, Statutes of 2012), and SB 1018 (Budget and Fiscal Review Committee, Chapter 39, Statutes of 2012) – that provide the framework for how the Cap-and-Trade program's auction proceeds are to be appropriated and expended.

These statutes required that the State portion of the proceeds from the auction of allowances under the Cap-and-Trade program be used to achieve additional reductions of greenhouse gas emissions and, where applicable and to the extent feasible, to further other goals of AB 32 and the Legislature. These expenditures were also required to comply with the requirements contained in SB 862 (Leno, Chapter 836, Statutes of 2014), the trailer bill establishing requirements for agencies receiving appropriations of Greenhouse Gas Reduction Fund (GGRF) monies.

SB 535 required that a minimum of 25 percent of the available proceeds be allocated to projects that provide a benefit to disadvantaged communities; and at least 10 percent of the available proceeds were to be allocated to projects located within disadvantaged communities.

SB 535 also directed CalEPA to identify disadvantaged communities for purposes of the GGRF programs based on geographic, socioeconomic, public health, and environmental hazard criteria.1 These communities may include, but are not limited to:

- Areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation.
- Areas with concentrations of people that are of low-income, high unemployment, low levels of home ownership, high rent burden, sensitive populations, or low levels of educational attainment.

In 2016, the Legislature passed and the Governor signed AB 1550 (Gomez, Chapter 369, Statutes of 2016), increasing the percent of funds for projects located in disadvantaged communities from 10 to 25 percent. This supplants the requirement in SB 535 that 25 percent of the funds must benefit disadvantaged communities. AB 1550 also created new investment requirements for low-income communities and households requiring that:

- At least 5 percent of the moneys allocated from the GGRF must fund projects located within and benefiting individuals living in low-income communities or fund projects benefitting low-income households statewide; and
- At least 5 percent of the moneys allocated from the GGRF must fund projects located within and benefiting individuals living in low-income communities, or benefiting low-income households, that are within ½ mile of a disadvantaged community.

Together, the legacy of SB 535 and the advent of AB 1550 assist the Cap-and-Trade program in prioritizing investments to those disadvantaged and low-income communities in need of assistance.

¹ Health and Safety Code section 39711.

III. CALENVIROSCREEN

Over the past three years, the Agency has successfully used CalEnviroScreen to inform the implementation of many policies, programs, and activities throughout the state. CalEnviroScreen was developed by OEHHA at the request of CalEPA to identify California's most pollution-burdened and vulnerable communities. The most recent version, CalEnviroScreen 3.0, uses a quantitative method to evaluate multiple pollution sources and stressors, and vulnerability to pollution, in California's approximately 8,000 census tracts. Using data from federal and state sources, the tool consists of four components in two broad groups. The Exposure and Environmental Effects components comprise a Pollution Burden group, and the Sensitive Populations and Socioeconomic Factors components comprise a Population Characteristics group. The four components are made up of environmental, health, and socioeconomic data from 20 indicators (see Figure 1). The CalEnviroScreen score is calculated by combining the individual indicator scores within each of the four components, then multiplying the Pollution Burden and Population Characteristics scores to produce a final score. Based on these scores, census tracts across California are ranked relative to one another. For more information on CalEnviroScreen scores, see the CalEnviroScreen 3.0 report.2

	Pollution Burden		Population Characteristics
Exposures	Ozone Concentrations PM2.5 Concentrations Diesel PM Emissions Drinking Water Quality Pesticide Use Toxic Releases from Facilities Traffic Density	×	Security Cardiovascular Disease Low Birth-Weight Births Asthma Emergency Department Visits = CalEnviroScreen
Environmental	Cleanup Sites Groundwater Threats Hazardous Waste Impaired Water Bodies Solid Waste Sites and Facilities		Score Educational Attainment Linguistic Isolation Poverty Unemployment Housing Burdened Low Income Households

Figure 1. CalEnviroScreen 3.0 Indicator a	nd Component Scoring
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The CalEnviroScreen methodology is based on several scientific principles including:

1. Scientific Literature: Existing research on environmental pollutants has identified socioeconomic and other sensitivity factors as "effect modifiers" that can increase health risk by factors ranging from 3-fold to 10-fold or greater, depending on the

² California Communities Environmental Health Screening Tool, Version 3 (CalEnviroScreen 3.0). Office of Environmental Health Hazard Assessment and the California Environmental Protection Agency, Sacramento, CA <u>http://oehha.ca.gov/calenviroscreen/report/calenviroscreen-30</u>. Available in English and Spanish.

combination of pollutants and underlying susceptibilities.

- 2. Risk Assessment Principles: Some people (such as those with underlying health conditions) may be 10 times more sensitive to some chemical exposures than others. Risk assessments, using principles first advanced by the National Academy of Sciences, apply numerical factors or multipliers to account for potential human sensitivity (as well as other factors such as data gaps) in deriving acceptable exposure levels.
- Established Risk Scoring Systems: Priority-rankings done by various emergency
 response organizations to score threats have used scoring systems with the formula:
 Risk = Threat × Vulnerability.

The public process for developing CalEnviroScreen was a multi-year effort that included consultation with other state agencies and stakeholders representing a wide cross-section of interest groups, multiple publicly released drafts, workshops, and comment periods. The process ensured transparency and the meaningful participation of all stakeholders, including low-income and minority populations, by holding workshops at convenient locations and times and providing language translation services to facilitate discussion with non-English speakers. OEHHA considered all the comments received and prepared and published a summary of comments and responses.³ For more information on prior versions of CalEnviroScreen, see the CalEnviroScreen archives page.⁴

In 2014, during the last designation process, CalEPA determined the CalEnviroScreen methodology to be the most suitable choice for identifying disadvantaged communities pursuant to SB 535. This methodology was selected since it most clearly met the statutory requirements in SB 535 that disadvantaged communities be identified based on a geographic, socioeconomic, public health, and environmental hazard criteria. Additionally, CalEnviroScreen offered the advantage of having been subject to extensive public review by community groups, businesses, academic experts, and government agencies across California. CalEPA will again use the CalEnviroScreen methodology to identify SB 535 disadvantaged communities.

IV. APPROACHES TO IDENTIFYING DISADVANTAGED COMMUNITIES

While CalEnviroScreen provides a reasoned, scientific base from which to work, identifying disadvantaged communities remains a challenging task. In general, the term disadvantaged is commonly associated with economic indicators related to poverty and income. Many of the comments received from our SB 535 workshops and public comment period focus on poverty as being the most important factor in determining whether an area should be considered disadvantaged. At the same time, the term community has numerous definitions ranging from a neighborhood within a city, to a small town or unincorporated area. In some cases, communities have been identified as an entire region. A few public comments pointed out that the use of census tracts as a proxy for a community might not give an accurate snapshot of an area where people associate with some type of commonality.

³ Comments received on CalEnviroScreen Version 3.0; available at: <u>http://oehha.ca.gov/calenviroscreen/comment/calenviroscreen-30-draft-public-comments.</u>

⁴ CalEnviroScreen Archive; available at <u>http://oehha.ca.gov/calenviroscreen/archive.</u>

In practice as well, there is no universal definition for disadvantaged communities. For instance, California has used the term "disadvantaged communities" in several state laws, but the underlying criteria used to identify these communities have not been consistent. As an example, disadvantaged communities are defined in the Safe Drinking Water Act as the entire area of a water system or community where the median household income is less than 80 percent of the statewide average.⁵ A number of state programs also use a median household income threshold to identify disadvantaged communities.⁶ Similarly, the Housing-related Parks Program administered by the California Department of Housing and Community Development implements a statutory definition for disadvantaged communities as census tracts designated by the United States Department of Housing and Urban Development with at least 51 percent of its residents at low- or moderate-income levels.⁷

In contrast to these other definitions, SB 535 requires CalEPA to take a multi-pronged approach to identifying disadvantaged communities that includes socioeconomic, public health and environmental hazard criteria. In this context, therefore, CalEPA has been directed to consider, but look beyond poverty and income statistics, to identify those areas of the state that are also disproportionately impacted by environmental pollution and negative public health effects.

A. Identifying a Percentage Threshold

Although CalEnviroScreen already ranks communities in California using the factors specified in SB 535, consideration was given to the percentage threshold that should be used to determine how many census tracts and how large a population should be defined as disadvantaged. SB 535 provided four categories of criteria that CalEPA must consider in making a determination on how to designate disadvantaged communities, but it did not specify how many communities or what percentage of the population should be included.

Version 1.0 of CalEnviroScreen, the version in circulation at the time of adoption of SB 535, suggested that the highest ranking 10 percent of zip codes should be used for identifying the most impacted communities in California. Because of the relatively larger size of zip codes in comparison to census tracts, this recommendation included approximately 20 percent of the state population in an impacted community. The Legislature was likely aware of the CalEnviroScreen results at the time SB 535 was adopted; however, it did not set a percentage threshold in SB 535. Instead, it directed CalEPA to make the designation of disadvantaged communities according to the criteria listed in the statute.

Setting a threshold in the range of 20 to 25 percent would be consistent with other legislation and studies regarding disadvantaged communities. For instance, in contrast to SB 535, the Legislature has determined in one other situation that CalEPA should identify 20 percent of the most impacted disadvantaged communities. SB 43 (Wolk, Chapter 413, Statutes of 2013) created the Green Tariff Shared Renewables Program to allow consumers to purchase voluntarily electricity from renewable energy facilities through major utility companies. This program is intended to allow low-income Californians, generally renters, to participate in the market for renewable energy. The pilot program is limited to 600 megawatts statewide, to be

⁵ Health and Safety Code section 116275(aa).

⁶ Public Resources Code sections 4799.09(a); 75005(g).

⁷ Health and Safety Code section 50700(b).

shared proportionally by the major utility companies that implement the program. One hundred megawatts of that maximum are reserved for smaller facilities (no larger than one megawatt generating capacity) that are located in areas "identified by the California Environmental Protection Agency as the most impacted and disadvantaged communities."⁸ This provision encourages renewable energy facility development in disadvantaged communities to realize the socioeconomic and environmental benefits of that development and provide those communities access to renewable energy.

Similar to SB 535, SB 43 tacitly references CalEnviroScreen by requiring these communities to be identified using a screening methodology designed to identify areas (1) disproportionately affected by pollution and environmental hazards and (2) with socioeconomic vulnerability.

Unlike SB 535, however, SB 43 not only asserts that the communities shall be identified by census tract, but also states that the communities shall be the most impacted 20 percent. By setting aside program funds to benefit disadvantaged communities, SB 43 provides CalEPA with general guidance on where to establish a percentage threshold for identifying disadvantaged communities. It is not determinative, however, of the precise threshold for communities identified as disadvantaged for the purposes of SB 535.In addition to looking at legislative approaches, CalEPA has also considered the portion of the state's population, families and households that represent traditional markers of being disadvantaged:

- In 2014, the California Poverty Measure developed by the Public Policy Institute of California and the Stanford Center on Poverty and Inequality identified about 20 percent of California residents were living in poor families.9
- In 2015, 18 percent of Californians ages 25 and over lacked a high school degree of equivalent.¹⁰
- In 2013, 21 percent of Californian households spent more than half their income on housing costs.11
- In 2014, the food insecurity rate for California children was 22.9 percent.12

While these data points do not represent a complete list of comparative markers related to being disadvantaged, these figures provide CalEPA some instruction in determining a practical percentage threshold for disadvantaged communities. CalEPA also must balance the value of being inclusive of the many communities that face pollution burdens and vulnerabilities, with the

https://factfinder.census.gov/bkmk/cf/1.0/en/state/California/EDUCATION/HS_OR_HIGHER_PCT 11 US Department of Housing and Urban Development. (2013). Comprehensive Housing Affordability Strategy 2009-2013 ACS – California [Data File]. Retrieved from

https://www.huduser.gov/portal/datasets/cp/CHAS/data_querytool_chas.html.

¹² Feeding America. (2016). Map the Meal Gap. Retrieved from <u>http://www.feedingamerica.org/hunger-in-</u> america/our-research/map-the-meal-gap/2014/map-the-meal-gap-2014-exec-summ.pdf

⁸ Public Utilities Code section 2833.

 ⁹ Sarah Bohn, Caroline Danielson, and Monica Bandy. (December 2015). Poverty in California. Public Policy Institute of California. Retrieved from http://www.ppic.org/main/publication_show.asp?i=261
 10 2011-2015 American Community Survey 5-Year Estimates. "Educational Attainment." United States Census Bureau/ American Factfinder. Retrieved from

consideration that an overly broad threshold would dilute the impact of SB 535 by spreading the funding across too many communities.

In view of this legislative history and these comparative markers, OEHHA and CalEPA discussed several possible thresholds in *Identifying Disadvantaged Communities*.¹³

B. High Pollution Burden - No CalEnviroScreen Score

Certain census tracts throughout the state have Pollution Burden scores at or above the 95th percentile, but they are not assigned an overall CalEnviroScreen score due to unavailable or unreliable Population Characteristics indicator data and scores. In spite of not having assigned overall CalEnviroScreen scores, these high pollution areas warrant consideration for designation as disadvantaged communities because they are burdened by significant environmental concerns. Moreover, these areas are frequently adjacent to communities that have high cumulative CalEnviroScreen scores.

There are 22 high pollution census tracts with no CalEnviroScreen score in maps of the CalEnviroScreen 3.0 results. Eleven of these census tracts each have populations of less than 50 people. Of the remaining 11 census tracts, five have fewer than 50 people that reside outside of non-household group quarters, such as correctional facilities, nursing homes, or student housing. These census tracts are not scored because several of the Population Characteristics indicators rely on household level statistics. Nearly all of the 22 high pollution census tracts are not scored for the low birth weight indicator (meaning there were fewer than 50 births between 2006-2012) and all 22 census tracts have unreliable or unavailable scores for several of the socioeconomic variables (meaning they have high margins of error for these estimates).

Of the 22 high pollution census tracts, 20 tracts are industrial areas in greater Los Angeles. The remaining two census tracts represent a military base in San Diego and a large sparsely populated area just north of Bakersfield.

V. PUBLIC INPUT

In February 2017, CalEPA, OEHHA, and the California Air Resources Board hosted public workshops in Fresno, Los Angeles, and Oakland as well as a live webinar. A key component of these workshops was to gather input from the public on how CalEPA should identify disadvantaged communities. To facilitate comments from the public, CalEPA and OEHHA released a discussion document titled *Identifying Disadvantaged Communities*.¹⁴ This document included maps and charts that illustrated the use of three percentage thresholds covering approximately 20 percent, 25 percent, and 30 percent of the state population.

The workshops were held in the evening and were well attended, with participants representing local and regional governments, community-based organizations, businesses, and residents. The format of these workshops was designed to maximize public input through small group

¹³ Identifying Disadvantaged Communities. The California Environmental Protection Agency and Office of Environmental Health Hazard Assessment, Sacramento, CA.

https://www.arb.ca.gov/cc/capandtrade/auctionproceeds/sb_535_identifying_disadvantaged_communities _1_31_17.pdf

¹⁴ Ibid.

discussions. Comments primarily focused on the percentage threshold used to identify disadvantaged communities, the inclusion of census tracts with high pollution burden but no population scores as disadvantaged, and the recent modifications to CalEnviroScreen that have been included in Version 3.0.

In general, Fresno workshop participants preferred the percentage threshold at 25 percent of the highest scoring census tracts. Comments related to the high pollution only areas were mixed; some participants stated that funding should focus on populated communities while others believed including environmental projects in those tracts would be beneficial to neighboring communities. Participants also shared concerns over the size of Central Valley census tracts not adequately representing rural communities.

Los Angeles participants' preferences were slightly more restrictive, with a considerable number of participants preferring 20-25 percent of the highest scoring census tracts. Several participants believed a 30 percent threshold would dilute funds from communities most in need of assistance. Many comments related to the high pollution only census tracts and suggested that they should be designated as disadvantaged because they are significant sources of pollution in the region.

At the Oakland workshop, comments on the threshold were generally more inclusive, promoting 25-30 percent of the highest scoring census tracts. In general, half of the attendees supported a 25 percent threshold as a good balance to target most impacted areas without leaving out some impacted communities that may have projects ready for investments. Advocates for the 30 percent threshold sought a more expansive approach that includes more communities eligible for funding.

In addition to comments at the workshops, CalEPA received over 20 formal written comments related to the identification of disadvantaged communities. Many of the written comments raised concerns similar to those identified in the public workshops.¹⁵ Others, however, called for additional indicators, including: veteran hospital visits in the border region, access to green space, housing stock quality, and food deserts.

Written comments from the Bay Area highlighted concerns with uniformly assigning weights to pollution burden indicators. Commenters suggest a weighting approach that would reflect relative health impacts. For instance, commenters noted that health impacts of fine particulate matter are much greater than for ozone. Other recommendations note that communities can be burdened by a few types of pollution and need not have high scores in all Pollution Burden indicators to suffer serious environmental health impacts.

Many written comments called for a cumulative scoring method that gives more emphasis or weight to poverty.

Finally, another large portion of comments focused on specific communities that did not receive high rankings or scores for certain indicators. In some cases, especially for census tracts along

¹⁵ Comments received on the identification of disadvantaged communities; available at: <u>https://www.arb.ca.gov/lispub/comm2/bccommlog.php?listname=ab1550meetings-ws</u>

the California border with Baja California, questions were raised about the accuracy or adequacy of the information used to derive a ranking or score.

VI. DESIGNATING DISADVANTAGED COMMUNITIES

A. The Percentage Threshold

The percentage thresholds associated with the approximately 8,000 census tracts identified in CalEnviroScreen generally correspond with the same percentages of the total California population of about 39 million. For example, a 20 percent threshold represents approximately 20 percent of the state's population. Similarly, a 25 percent threshold represents approximately 25 percent of the state's population.

During our public process, we received suggestions on what percentage of the highest scoring census tracts should be considered disadvantaged for purposes of SB 535 and AB 1550. CalEPA considered these recommendations and also relied on legislative direction, comparative markers of being disadvantaged, and principles of fairness, all discussed above, to determine that we should continue to use a percentage threshold of 25 percent to designate disadvantaged communities.

We considered the option of identifying only the top scoring 20 percent of census tracts as disadvantaged because this would concentrate funding from the Cap-and-Trade program on the areas of the state most in need. It appears, however, that this threshold would leave out several regions identified as disadvantaged in other studies. For example, a number of comments noted that a threshold of 20 percent might exclude communities commonly associated with environmental justice concerns, such as areas around the Port of Oakland, portions of East Los Angeles and regions along the border with Mexico.

CalEPA also received comments asserting that the percentage of the population targeted for funding should be equal to or less than the percentage of funds allocated to disadvantaged communities in SB 535. These commenters suggested that a threshold greater than 25 percent, such as 30 percent, would be regressive for disadvantaged communities because SB 535 requires that only 25 percent of Greenhouse Gas Reduction Fund monies must be located in those communities. This reasoning supports a designation of a threshold less than 30 percent.

A threshold of 25 percent is closer to the approach taken in earlier versions of CalEnviroScreen and in legislation regarding projects in disadvantaged communities. Additionally, traditional markers of disadvantaged communities have generally found that slightly over 20 percent of the population may be adversely affected by unemployment, poverty, or a lack of access to proper healthcare or nutrition.

Setting the threshold at 25 percent while we continue to refine the information and methodologies used to develop CalEnviroScreen will provide a margin of safety that ensures that communities close to the threshold are not inappropriately excluded. Moreover, with new investment requirements for low-income communities and households through AB 1550, we now see a much broader landscape of communities with priority for funding distributed

throughout the various regions of the state.¹⁶ This expansion of priority communities will increase the potential for project proposals that reduce greenhouse gases and maximizes benefits to both disadvantaged communities and low-income communities.

Therefore, after taking into consideration legislative direction, comparative markers of being disadvantaged and basic principles of fairness, CalEPA will use a 25 percent threshold to identify disadvantaged communities. Maps of the top 25 percent highest scoring census tracts and low-income communities pursuant AB 1550 are provided as an attachment to this document.

B. High Pollution Census Tracts

In addition to percentage thresholds, CalEPA also sought input on whether to include census tracts that score in the highest 5% of Pollution Burden, but do not receive an overall CalEnviroScreen score due to unreliable public health and socioeconomic data. These census tracts generally reside in areas that are sparsely populated and located adjacent to census tracts that score in the top 25%. In some cases, these census tracts represent some of the most significant pollution point sources in a region. Many of these high pollution census tracts are ports, airports, or heavy industrial areas. Including these areas would add 22 more census tracts as disadvantaged communities.

After reviewing public comments and taking into consideration the geographic significance of these census tracts, CalEPA will include these areas as disadvantaged communities for the purposes of SB 535.

VII. ONGOING PROCESS

CalEnviroScreen is the result of an iterative, public process that included input from a wide cross-section of interested groups across the state. We remain committed to further improve and refine this innovative tool.

We recognize that in assigning CalEnviroScreen scores for each of the approximately 8,000 census tracts in California, it is possible that data concerning individual tracts may have been missed or misinterpreted. We will continue to work with local and regional jurisdictions to review our data and verify results on an ongoing basis. If recalculation of a community's CalEnviroScreen 3.0 score shows that it should have been identified as a disadvantaged community, we will add that community to the list for this designation. We will not remove a community from the list for the current designation, however, if recalculation of their CalEnviroScreen 3.0 score shows that they were incorrectly identified as a disadvantaged community because we do not want to disrupt any funding decisions already in process.

Finally, this decision, while important, is one step in the process of ensuring that these investments yield significant benefits to California's disadvantaged communities. Much of the

¹⁶ AB 1550 includes two definitions for "low-income:" Income within a census tract or household is at or below 80% of the statewide median household income; or Income within a census tract or household is at or below the threshold designated as low-income by the Department of Housing and Community Development's list of State income limits. Together, both definitions include census tracts that comprise 47% of the State's population. An electronic version of this map is available at: <u>http://www.calepa.ca.gov/envjustice/ghginvest/</u>

success depends on the implementation by administering State agencies. ARB has provided valuable guidance to these agencies for how they can maximize benefits to disadvantaged communities while meeting statutory requirements. It is critical that agencies make the most of this unique opportunity to have a transformative impact on California's most disadvantaged communities.

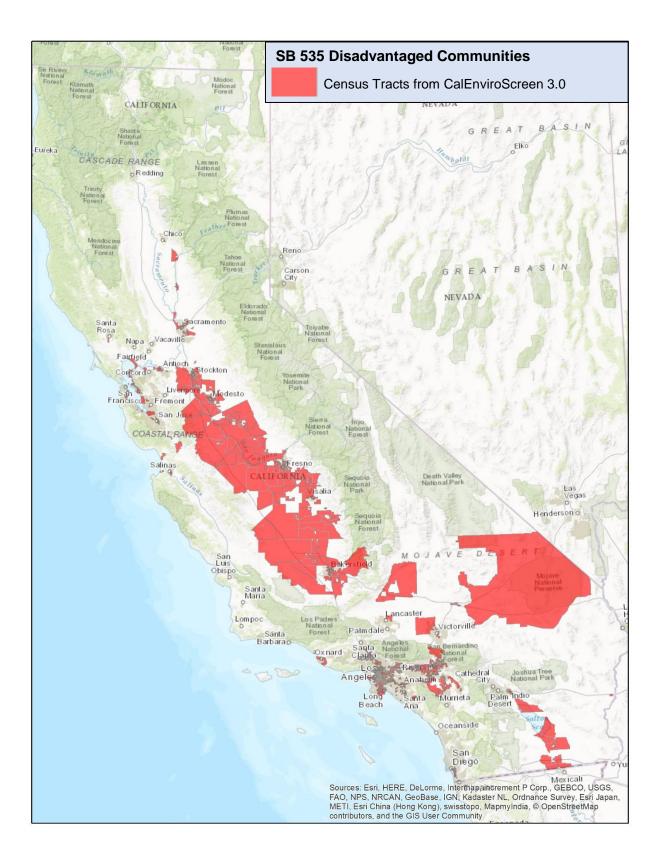
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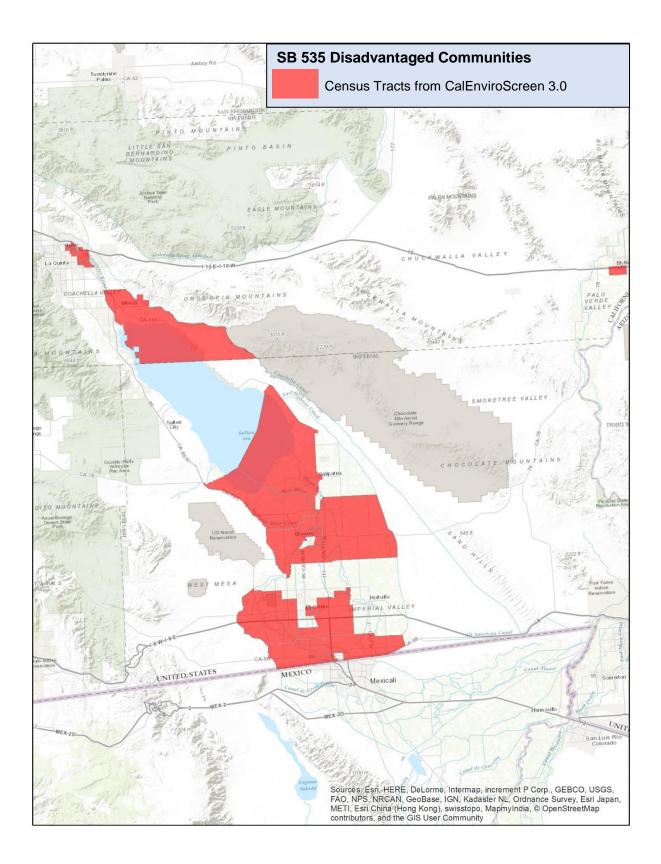
SB 535 Disadvantaged Communities maps (CalEnviroScreen 3.0)

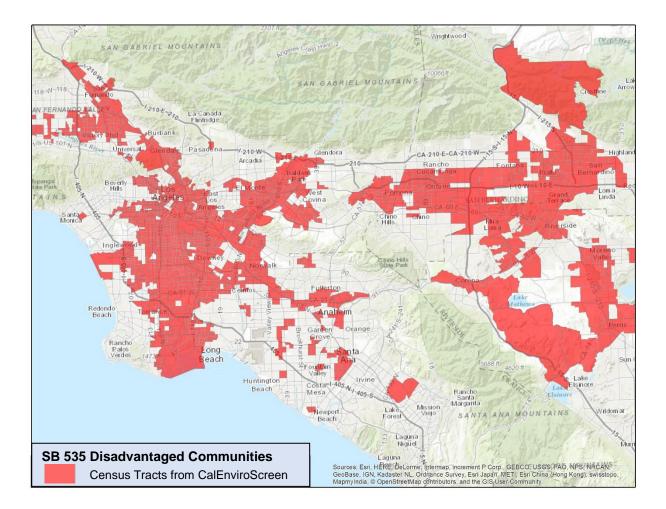
AB 1550 Low-income Communities maps

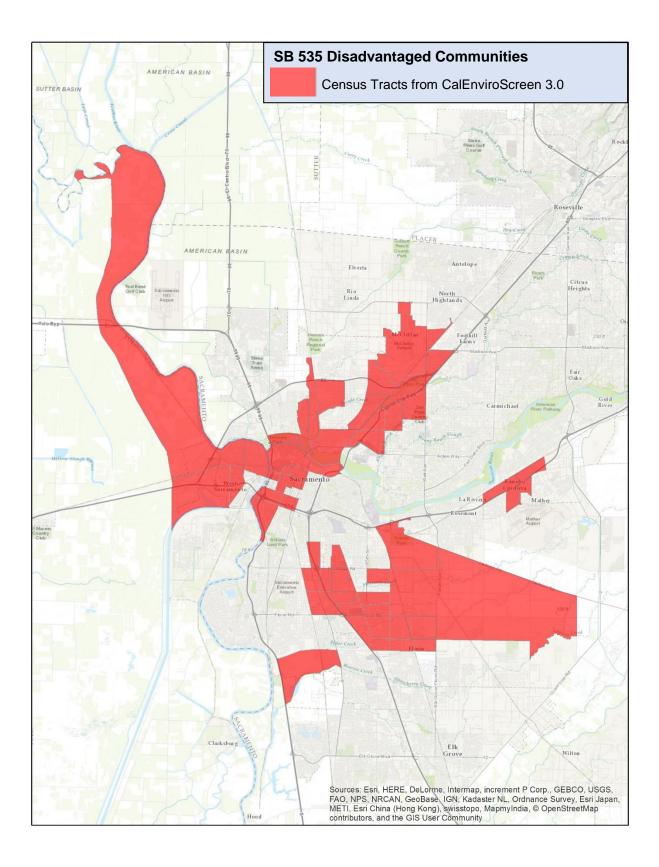
Both SB 535 Disadvantaged Communities and AB 1550 Low-Income Communities

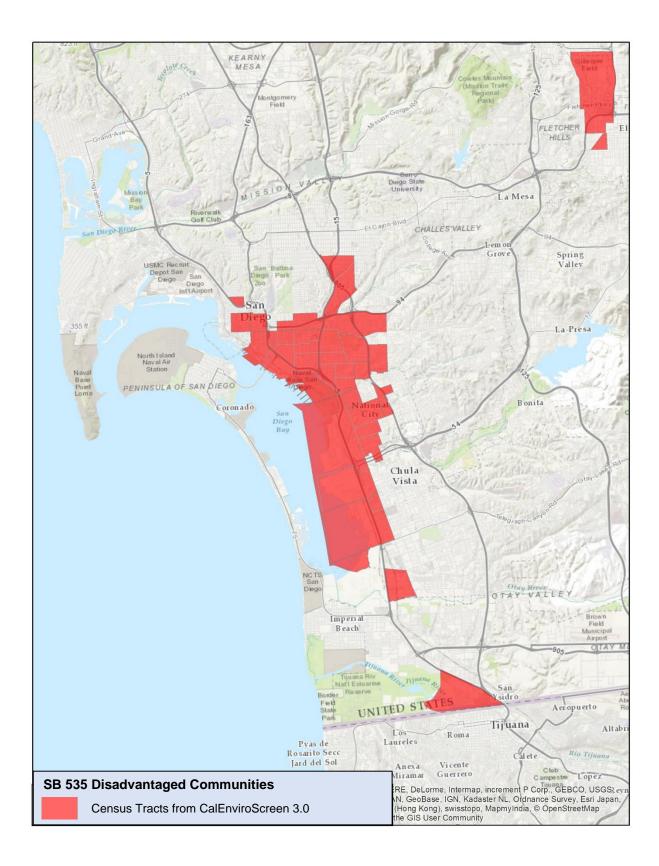
^{*}Please note these AB 1550 maps do not illustrate individual low-income households throughout the state or low-income households and communities within a ½ mile of a disadvantaged community. For more detail, interactive maps are available at: <u>http://www.calepa.ca.gov/envjustice/ghginvest/</u>

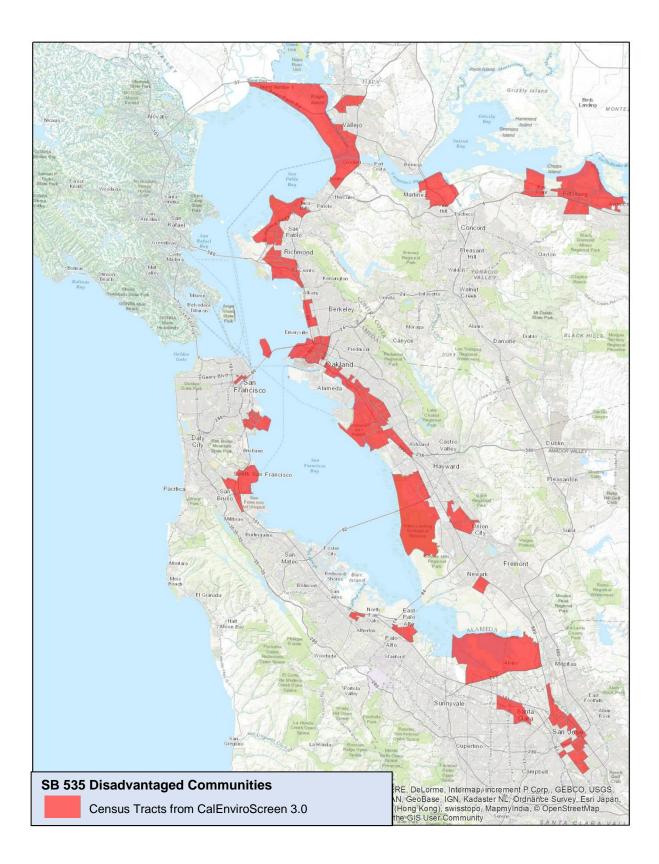


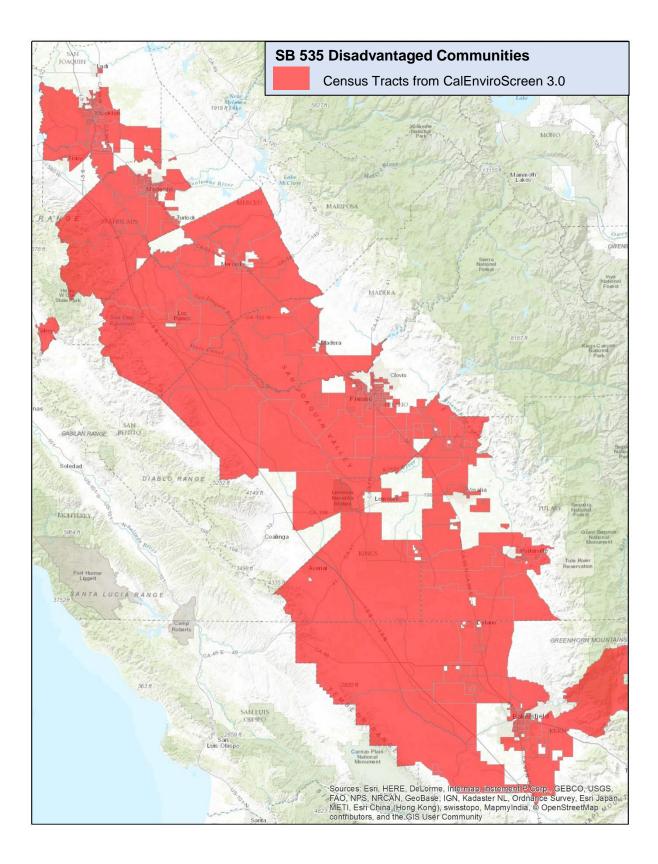


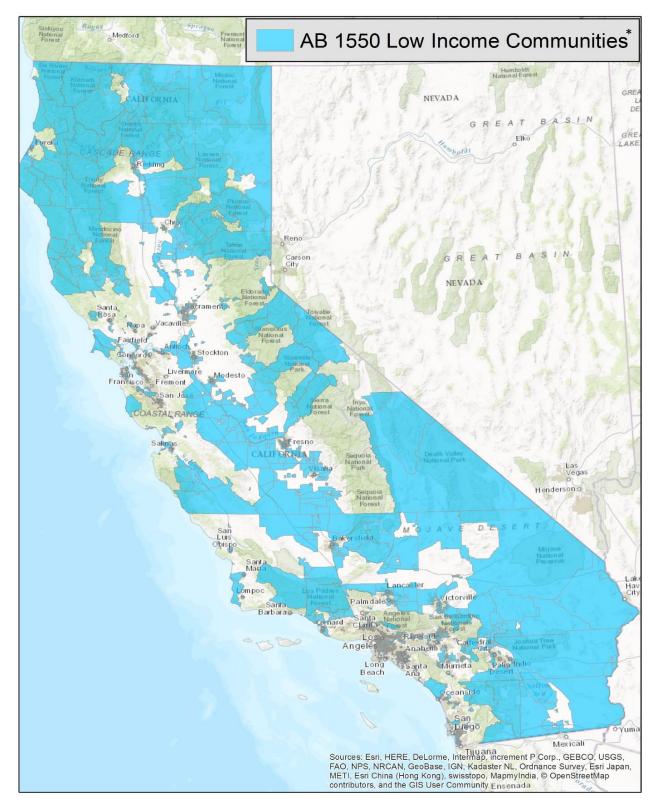












*Please note these AB 1550 maps do not illustrate individual low-income households throughout the state or low-income households and communities within a ½ mile of a disadvantaged community.

