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May 14, 2021

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

**RE: Draft CalEnviroScreen 4.0**

Dear Ms. Mitchell,

Thank you for the opportunity to comment on the draft CalEnviroScreen (CES) 4.0 report. The undersigned members of the Sierra Climate Adaptation and Mitigation Partnership (Sierra CAMP) write to express our concern that the CES 4.0 methodology for identifying disadvantaged communities precludes many small, rural communities from accessing significant support from the Greenhouse Gas Reduction Fund (GGRF) and numerous other programs, despite being disadvantaged in both the common sense understanding of the term and as intended by SB 535.

Sierra CAMP is a public-private, cross-sectoral partnership dedicated to promoting climate action and resilience in the Sierra Nevada region, a broad swath of the state that spans the Sierra Nevada mountain range as well as parts of the Mojave Desert, the Southern Cascades, and the Modoc Plateau. The partnership, hosted by the Sierra Business Council, is also a member of the Alliance of Regional Collaboratives for Climate Adaptation (ARCCA), which itself is supported by the Governor's Office of Planning and Research. We hope that our suggestions can help strengthen the mechanism(s) used for defining *disadvantaged*, particularly as it pertains to rural mountain communities, for the purposes of allocating GGRF dollars.

Like its predecessor versions, CES 4.0 uses a methodology emphasizing the cumulative impacts of multiple pollution burdens to identify disadvantaged communities for the purposes of GGRF allocation. While we support funding dedicated to disadvantaged communities as defined, there is also a need to reach other heavily impacted, low-income areas of the state that also have the ability and desire to reduce greenhouse gas emissions through local action. As members of Sierra CAMP, many of us live in, work in, or represent communities that are rural and isolated, with unidentified pollution exposures due to a sustained lack of monitoring and limited financial and community capacity to respond to challenges.

**SB 535, the statute requiring CalEPA to identify disadvantaged communities for the purposes of GGRF allocation, does not restrict disadvantaged designation to only communities with multiple pollution burdens. In fact, SB 535 offers a wide range of potential criteria for defining "disadvantaged," including geographic, socioeconomic, public health, and environmental hazard criteria.** In the statute, "areas disproportionately affected by environmental pollution and other hazards" are placed on equal footing with "areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment" as two *examples* of how disadvantaged might be defined.<sup>1</sup> These examples are just that: examples. They are not meant to be limiting factors. Despite this, by combining pollution burden

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<sup>1</sup> California Health and Safety Code, section 39711



indicators with population characteristic indicators, the CES methodology effectively turns two equally-weighted examples into a two-pronged criterion for disadvantaged designation.

To better fulfill the original intent of SB 535, we recommend the following additional criteria or mechanisms for defining disadvantaged:

1. **Department of Water Resources Disadvantaged Communities:** The Department of Water Resources uses an alternative definition for disadvantaged communities that considers the median household income of an area relative to the state median income.<sup>2</sup> This tool more effectively identifies communities based on the resources they have available to work toward climate resilience.
2. **Economically Distressed Areas Defined by Proposition 1:** Proposition 1 defines an Economically Distressed Area as a “municipality with a population of 20,000 persons or less, a rural county, or a reasonably isolated and divisible segment of a larger municipality where the segment of the population is 20,000 persons or less, with an annual median household income that is less than 85 percent of the statewide median household income.”<sup>3</sup> These areas must also meet one of the following criteria as determined by the Department of Water Resources: financial hardship; unemployment rate at least 2 percent higher than the statewide average; and low population density.

Despite these significant flaws in the CalEnviroScreen methodology, we do appreciate the attention in CES 4.0 to updating individual indicators as they pertain to rural areas. In particular, the transition to satellite data to measure PM2.5 concentration in census tract centers more than 50 kilometers from a monitor will improve the accuracy of PM2.5 data in the Sierra Nevada region, which has few monitors and topography that can concentrate particulate matter in small geographic areas.

**However, recent scientific studies indicate the critical importance of further updating the methodology for measuring PM2.5 concentration to reflect the dramatic spikes in PM2.5 experienced across the state during the 2020 wildfire season.** Research published in Nature Communications in 2021 found that “wildfire-specific PM2.5 were up to 10 times more harmful [to respiratory health] than non-smoke PM2.5.”<sup>4</sup> Given these findings, it is critical that the CES PM2.5 methodology account for the magnitude and duration of the dramatic spikes in PM2.5 concentration due to wildfire, rather than simply reflect the long-term average. Last fall, for example, areas in Mono and Inyo Counties experienced ongoing air quality more than triple the hazardous rating, inflicting untold health impacts and economic damages. **Given our improved understanding of the deleterious health effects of wildfire-specific PM2.5 exposure, wildfire-specific PM2.5 spikes should be weighted appropriately in the CES methodology.**

To be clear, we do not support rescinding disadvantaged designation for any community currently identified as such. Rather, we propose a multiple-lane solution for identifying disadvantaged communities that reflects and respects California’s remarkable geographic, economic, and resource diversity. **A statewide tool of this magnitude, used by at least 11 different statewide programs to allocate funds, must be made to work in the context of the entire state, including its rural mountainous regions.**

Thank you again for the opportunity to comment on the draft CalEnviroScreen 4.0. We remain committed to assisting your efforts to identify and support the critical role that underserved rural communities can play in reducing California’s GHG emissions and creating a more sustainable future for all residents of California.

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<sup>2</sup> California Water Code, section 79505.5

<sup>3</sup> California Water Code, section 79702

<sup>4</sup> Aguilera, R., Corringham, T., Gershunov, A. *et al.* Wildfire smoke impacts respiratory health more than fine particles from other sources: observational evidence from Southern California. *Nat Commun* 12, 1493 (2021). <https://doi.org/10.1038/s41467-021-21708-0>



Sincerely,

*Steven R. Frisch*

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