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# Assembly California Legislature



**BILL DODD**  
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ON WINE

October 19, 2016

Dr. Lauren Zeise, Acting Director  
Office of Environmental Health Hazard Assessment (OEHHA)  
P.O. Box 4010  
Sacramento, CA 95812-4010

## RE: CalEnviroScreen 3.0

Dear Dr. Zeise:

I am writing to express my concern that the proposed CalEnviroScreen 3.0 still fails to address the needs of some of the poorest communities in our state.

As you are probably aware, consumers often bear the burden of costs incurred by businesses that are subject to carbon emission limits and who purchase credits under Cap-and-Trade. Some of the communities that I represent have high poverty levels, such as Lake County, which is generally ranked one of the poorest counties in California. These communities are burdened with the costs of addressing climate change, yet CalEnviroScreen 3.0 would continue to deny them commensurate benefits in the form of investment in their communities. We must address climate change, and we must take care to do so in ways that support low-income communities.

I have consulted with several organizations in the region I represent that have studied the current and proposed CalEnviroScreen models, and have concluded that there are several issues not adequately addressed by either version. I am particularly concerned that CalEnviroScreen 3.0 will most likely be used once again by CalEPA to define what communities are eligible to receive cap-and-trade funding. The following points summarize my concerns, which I ask CalEPA to consider before deciding on the final methodology for CalEnviroScreen 3.0.

- Selective reading of the definition of “disadvantaged communities”:

CalEnviroScreen 3.0 continues to rank the status of “disadvantaged communities” through a score determined by the combination of *both* environmental *and* socioeconomic burdens, despite the fact that SB535 (Chapter 830, Statutes of 2012) specifies that programs may consider *either* environmental *or* socioeconomic factors. For example, in Lake County, 24% of residents live in poverty, making it the second poorest county in the state. In Lake County’s town of Clearlake, more than a fifth of the town's residents are disabled, and less than 8% of its residents hold a bachelor’s degree or higher — markedly worse than county and national averages of 16% and 30%, respectively. Furthermore, due to global climate change, Clear Lake, which is a major economic driver for the county, faces significant challenges, such as toxic algae (cyanobacteria) blooms and fish die offs. Indeed, climate change could lead to the extinction of the Clear Lake hitch, designated as a threatened species under California’s Endangered Species Act.

Yet the state has not invested adequate resources to protect this critical economic and environmental treasure. Through the Greenhouse Gas Reduction Fund Program, \$144 million will be made available to disadvantaged communities for a wide range of projects, such as affordable housing and reducing risk for wildfires. Lake County, however, will not likely receive any of those funds because they do not qualify as sufficiently “disadvantaged” under CalEnviroScreen.

I urge you to reconsider the definition of disadvantaged communities in order to give high-poverty counties, such as Lake, access to these funds, whether through disaggregating pollution and population burden scores, recommending adoption of external definitions of disadvantaged communities such as that used by the California Transportation Commission (less than 80% of the statewide median household income), or any of the other options available. While CalEnviroScreen does serve a unique purpose, its definition of “disadvantaged” is a narrow one that, when combined with the broad funding opportunities offered to those who meet its criteria, systematically excludes rural low-income counties, including those most impacted by global climate change.

- Failure to consider episodic emissions events in pollution burden:

Despite wildfire emissions accounting for more than half of California’s annual black carbon emissions, rural communities affected by the air quality impacts of wildfires are ineligible for “disadvantaged communities” funding from the GGRF because the tool does not consider episodic emissions events like wildfires. Lake County is an especially tragic example of the way in which this omission fails rural communities: although intense fires have devastated the area and created a public health hazard over the past couple of years, they remain ineligible for funds that would help them to rebuild sustainably and address the hardships they have faced.

- Weighting of Pollution Indicators but not Population Indicators:

Under the pollution burden umbrella, “environmental effects” are half-weighted so that “exposures” have a greater effect on the overall scoring. However, similar weighting is not given to factors under the population burden umbrella. Science has shown that social determinants are the largest contributor to health and quality of life. Poverty in particular has a much greater effect on health outcomes, leading it to hold much higher weight in other measurements of public health, such as the Public Health Alliance of Southern California’s Health Disadvantage Index. Given this information, I propose weighting poverty more heavily in the equation.

- Rent-Adjusted Income does not measure Residual Income:

While the addition of rent-adjusted income to CalEnviroScreen 3.0 is a step in the right direction, it does not fully depict the realities of low-income areas. Non-housing costs such as transportation fuel can be an equally difficult burden to bear in rural counties with few to no public transportation options. Therefore, I believe that transitioning to a measurement of “residual income” that takes into account more of the necessary costs of living will provide a more accurate picture.

While the diligence and hard work that has gone into crafting CalEnviroScreen 3.0 is to be commended, the revisions are ultimately inadequate, as they leave behind communities struggling with climate change who are at the same time forced to unequally shoulder the burden of GHG expenses. We need to ensure that such communities are eligible for funding in some way, lest this tool created to bridge inequality in California end up deepening it.

Sincerely,



Bill Dodd  
Assemblymember, District 4

cc: Keely Bosler, Cabinet Secretary to Governor Brown  
Carol J. Huchingson, County of Lake  
Patricia Megason, RCRC  
Tom Addison, BAAQMD  
Rebecca Long, MTC