

October 21, 2016

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Subject: CalEnviroScreen 3.0

Dear OEHHA/CalEPA,

EN2 Resources (EN2) appreciates this opportunity to comment on the latest version of the California Communities Environmental Health Screening Tool: CalEnviroScreen 3.0. EN2 serves as a water and energy resources consultant for the Sierra Nevada and other California communities. As the CalEnviroScreen methodology is used to identify disadvantaged communities (DAC) eligible for greenhouse gas reduction funds (GGRF), the communities we serve will be impacted by this tool.

The Sierra Nevada is a unique area in California that spans rural towns and popular lake and mountain resort communities, many of which qualify as low-income, isolated, and economically disadvantaged. The screening methodology laid out by CalEnviroScreen is negatively biased against rural Sierra Nevada residents, commercial businesses, and agencies, thereby making these areas ineligible for acquiring funding support to implement greenhouse gas reduction programs.

CalEnviroScreen focuses heavily on pollution hazards, defined by urban region pollution criteria. As a result, the tool does not represent the climate change burden faced by rural disadvantaged low-income communities, and excludes much of rural California, including the Sierra Nevada region. This exclusion has serious funding ramifications, causing rural California communities to fall behind other regions in the state that are deemed DAC, and therefore eligible for GGRF allocations.

Much of the Sierra Nevada/Lake Tahoe region is economically isolated and disadvantaged, with unemployment rates higher than state averages and incomes in decline since 2010. As an example, in 2014, 60.4% of students in the Lake Tahoe Unified School District participated in the free and reduced school lunch program (Tahoe Prosperity Center, 2015). The Department of Water Resources (DWR) Disadvantaged Communities Mapping Tool identifies the City of South Lake Tahoe as a DAC, using the definition provided by Proposition 84 Integrated Regional Water Management Guidelines. This definition states that a DAC is a community with a median household income (MHI) that is less than 80% of the statewide annual MHI. South Lake Tahoe's MHI is 67% of the statewide average. Under the DWR mapping tool, 59% of the Sierra Nevada region would meet the DAC classification (US Census Bureau).

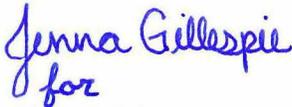
Additionally, the Sierra Nevada/Lake Tahoe region suffers from unique environmental and public health conditions. Lake Tahoe is a prized scenic location with a nutrient-sensitive lake that makes up much of the high elevation basin, which is not a typical urban condition. For this reason, Tahoe was made into its own air basin by California and Nevada in the 1970s and was provided with air quality standards better suited to this particular site. Much of the air pollution in Tahoe is created within the basin and is caused primarily from exhaust and emissions, resulting in toxic ozone levels. Tahoe has consistently been listed as a "nonattainment" area for ozone, violating state, federal, and basin air quality standards. The steady increase in ozone at Lake Tahoe from 1977 to the present is peculiar in all of California. Additionally, both regional and subregional visibility has steadily degraded (USFS 2000).

Wildfires and prescribed burns are additional unaccounted factors that affect the air quality of the Sierra Nevada region. Due to past suppression tactics for naturally occurring wildfires, the continued drought epidemic, and the bark beetle infestation crisis, forests in the Sierra Nevada are prone to severe wildfires, which can have massive air and water quality impacts. Pollutants from massive fires have resulted in algal blooms in Lake Tahoe (Cahill 2009). The smoke plumes from extensive crown fires also impact protected Class I areas of the United States where visibility must be protected (USEPA 1999). Prescribed burns, that help manage and reduce the likelihood of large-scale wildfires, are a constant presence in the Tahoe region, especially during seasons of lower fire danger levels. Wildfire-generated smoke emissions typically exceed all state and federal air quality standards and are capable of causing serious health problems.

EN2 recommends that CalEnviroScreen 3.0 include a provision for economically disadvantaged rural communities, like the Sierra Nevada, that allows for DAC recognition. California's rural mountain communities, including the Lake Tahoe region, aspire to meet GHG reduction and climate adaptation goals. Implementation of these goals are dependent on access to critical funding resources, like the GGRF. However, CalEnviroScreen does not comprehensively (nor fairly) account for the income disparities or environmental impacts faced by rural communities, and as a result it compromises the ability for our communities to meet California's ambitious Global Warming Solutions Act. Exclusion of the economically disadvantaged rural communities in the Sierra Nevada is not a viable solution to the global climate challenge.

Thank you for the opportunity to submit comments on CalEnviroScreen 3.0. We hope the Office of Environmental Health Hazard Assessment and the California Environmental Protection Agency will take into account the needs of California's rural, mountainous communities.

Sincerely,



Rick A. Lind
President

cc: John Kingsbury, Executive Director, Mountain Counties Water Resources Association

References

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