



September 15, 2014

**Comments on Investments to Benefit Disadvantaged Communities
Interim Guidance to Agencies Administering Greenhouse Gas
Reduction Fund Monies and
California Communities Environmental health Screening Tool**

My name is Jonathan Kusel and as rural sociologist I have studied rural communities for over twenty years. I led the community assessment team for the Sierra Nevada Ecosystem Project and, more recently, I've completed social assessments encompassing rural forest communities in the Sierra Nevada and Northern California regions.

As stated, "The California Environmental Protection Agency (Cal/EPA) recognizes that many Californians live among multiple sources of pollution and that some people and communities are more vulnerable to the effects of pollution than others. It is important to identify disadvantaged communities that face multiple pollution burdens so programs and funding can be targeted appropriately toward raising the economic and environmental status of the most affected communities."

Communities facing multiple pollution burdens are disadvantaged, but these communities do not constitute the universe of disadvantaged communities in California. The term disadvantaged is defined by Webster's dictionary as "deprivation of advantage" or "unfavorable... condition or circumstance." There are many communities that are seriously disadvantaged yet rate low on the CalEnviroScreen disadvantaged scale because of the measures and the scoring method employed by CalEnviroScreen 2.0.

In the Cap-and-Trade Auction Proceeds Interim Guidance to Agencies Administering Greenhouse Gas Reduction Fund Monies" (released August 22, 2014) by the Air Resources Board, the section "Identification of Disadvantage Communities "(on page 9) states:

SB 535 directs the Secretary for Environmental Protection at CalEPA to identify disadvantaged communities. Identification must be based on geographic, socioeconomic, public health, and environmental hazard criteria (Health and Safety Code Section 37911). These criteria 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.

SB 535 offers good direction but recommendations fall short without identifying how criteria should be balanced. This is particularly important when a community has low levels of environmental pollution and some measures are simply excluded because of limited or absent data. This is a persistent rural problem.

CalEnviroScreen 2.0 over weights sources of pollution and other measures that are highly correlated with urban areas to determine “disadvantaged” communities. As a scientist who has developed multi-item scales to assess socioeconomic health across multi-state regions and assessed rural community health, it is both startling and disappointing that the CalEnviroScreen excludes the seriously and, unfortunately, numerous disadvantaged communities in the mountain and forested regions of California.

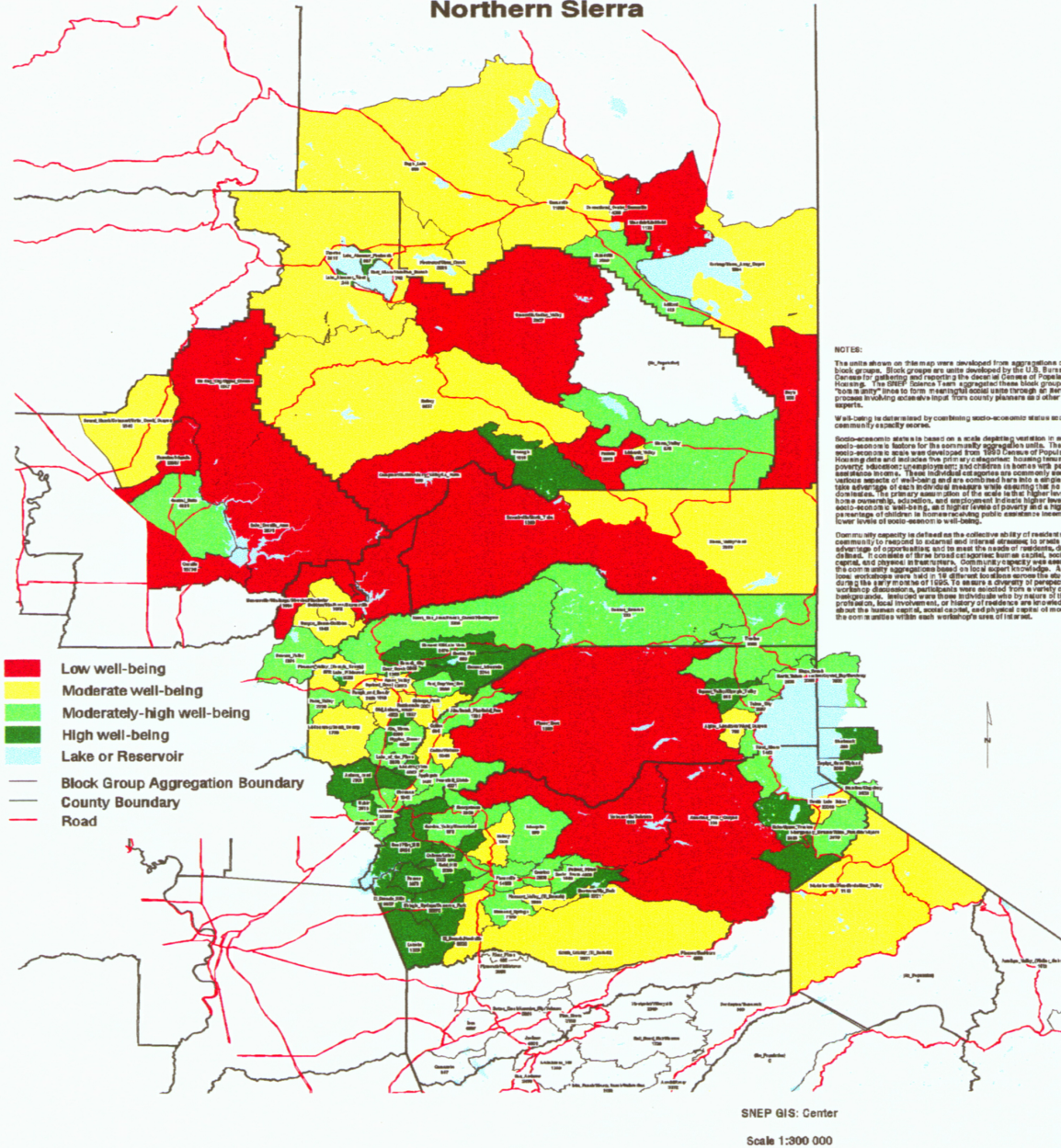
On the following page I’ve included a graphic of the Sierra Institute’s study of the Northern Sierra Region for the Congressionally funded Sierra Nevada Ecosystem Project. This project was completed many years before CalEnviroScreen 2.0 was completed, but most of the communities included are become more impoverished. With the exception of eastern Butte County there is little overlap of low well-being communities with CalEnviroScreen 2.0 “disadvantaged” communities. The Sierra Nevada project was peer reviewed.

CalEnviroScreen on page I states that it “ensures the fair treatment of all Californians, including minority and low income populations.” It won’t, or as this graphic and our subsequent research shows, large swathes of impoverished rural communities will not score in the higher quintiles of disadvantaged. The attached graphic displays the northern Sierra region, but when the entire Sierra region is linked and standardized with the Klamath Region, which extends the area included to Humboldt County, the most impoverished communities are Native American dominated North Coast communities. These communities, too, do not score in the higher quintiles of CalEnviroScreen.

(continued following the graphic)

Community Well-Being in the Sierra Nevada

Northern Sierra



I appreciate the fact that CalEnviroScreen 2.0 improved measure of low birth weight babies and developed a more nuanced measure of poverty as I recommended in my critique of version 1.0. But deficiencies remain.

The mapped results of CalEnviroScreen 2.0 shown on page 138 once again show the highest scores are in urban areas. This is more reflective of the fact that selected

indicators are biased towards these results as opposed to the fact that those who are most disadvantaged live in these areas.

It would be useful to show a correlation of all measures used in CalEnviroScreen 2.0 with population density and other measures of urban areas. This will show measures that “force” the analysis and determination of “disadvantaged” into urban areas, or can be used to argue more persuasively that the measures used are sufficiently independent and do not bias the results.

The fact that “disadvantaged” is almost completely an urban phenomena ought to compel serious re-examination of methods used. As I said in my first letter, I don’t think this is the intended effect, nor should it be, but it is the outcome nonetheless.

Because CalEnviroScreen 2.0 retains many of the deficiencies I identified in 1.0 and above, the “Interim Guidance” document rests on a fundamental problem if not a faulty foundation. This needs to be remedied for the public to have confidence in the tool, the process, and sound investment of greenhouse gas reduction fund monies.

I would be happy to respond to questions asking for more detailed explanations.

Thank you for your interest in these comments.

Sincerely,

Jonathan Kusel, Ph.D.
Executive Director