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**RE: CalEnviroscreen 2.0 comments**

The Glenn County Air Pollution Control District (District) would like to submit the following comments regarding CalEnviroscreen 2.0.

The District praises the efforts of CalEPA and OEHHA for accommodating the numerous comments submitted regarding previous versions of CalEnviroscreen. The task of identifying Disadvantaged Communities appears to be a huge effort.

CalEnviroscreen 2.0 used 8,000 census tracts, although the size and population contained within each tract varies greatly, especially in the rural areas. After scrutinizing the scatter graphs that identified the “communities” burdened with the most pollution, it became evident that Glenn County, and most of the rural “North State” census tracts will receive little or no funding for environmental projects. I am unsure how the determination of the census tracts was determined. Although CalEnviroscreen 2.0 uses 12 types of environmental and pollution factors as well as seven population and socioeconomic factors, the tool is biased toward densely populated areas.

I have highlighted below some areas where I believe your model does not accurately reflect Glenn County and most of the “North State” category with respect to the level of being “disadvantaged.”

**Low Birth Weight** – Babies that are born to Glenn County residents use Enloe Hospital in Chico (Butte County). The relatively few babies that are born at the Glenn Medical Facility would be as a result of an emergency situation. There are no Ob-Gyn physicians in the area. How can any census tract accurately reflect this category?

**Asthma Emergency Department Visits** – Again, there are no ENT specialists in Glenn County. Most asthma sufferers will visit Enloe Hospital in Chico rather than the Glenn Medical Facility. The model cannot accurately reflect this category either.

**Education Attainment** – According to the 2010 U.S. Census, the state average for persons with college degrees in 30.4%. Glenn County is at 15.4%.

**Poverty** – Per capita Glenn County money income (12 months, 2012 dollars), 2008-2012 was $21,669 compared to the state average of $29,551. The median household income (2008-2012) was $42,641 for Glenn County compared to $61,400 for the state.

**Sensitive Population** – Glenn County persons under 5 years of age is 7.3% compared to the state average of 6.5%. Glenn County persons over age 65 is 14.6% while the state average is 12.5%.

**Unemployment** – Glenn County ranks 48th in the state with 11.1% unemployment as of July, 2014. The state average is 7.8%.

**Pesticide Use** – The model uses a hard number in pounds to delineate “pesticide use” without regard to the relative toxicity of the pesticides being used. The model erroneously will give the same amount of weight to a relatively safe pesticide as it would to a fungicide or organophosphate. Glenn County also has 100,000 acres of rice. All the pesticide and fungicides used on rice are applied to are in contact with water and will reside there until drained off.

**Drinking Water Quality** – Many of the residents in Glenn County use domestic wells for their water source. Many of these residences have been passed down from generation to generation. This type of ownership continuity will result in direct transfers of property without the requirements for well testing when a lending institution is involved. I do not believe the GAMA report from the State Water Resources Control Board went far enough to seek out some of the truly rural domestic wells for their study.

 I am very concerned that Glenn County and the North State will be subsidizing the gas monies collected in the Cap and Trade program with little to show because of our population density and seeming lack of being “disadvantaged.” I am hoping that you look further into the examples I have provided and that Glenn County and the North State should be reconsidered when determinations are made as to how the SB535 monies will be directed.

If you have questions, please feel free to call me at (530) 934-6500.

Sincerely,

Kevin Tokunaga

Glenn County Air Pollution Control District/CUPA

Environmental Program Manager