



## El Dorado County Water Agency

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April 10, 2017

California Air Resources Board & CalEPA

Subject: Public Workshop on 2017 Climate Change Scoping Plan Update & Sierra Nevada E-Listening Session – EJAC Community Workshop

Dear CARB and CalEPA,

Please accept this comment letter from the El Dorado County Water Agency (EDCWA) in response to the CARB and CalEPA public workshop on the 2017 Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target and the EJAC community workshop: Sierra Nevada Session. The EDCWA develops countywide water planning and advocates for the water interests of El Dorado County. Given the nexus of water, transportation, and energy use, EDCWA is invested in promoting greenhouse gas (GHG) reduction opportunities for our region.

The availability of cap-and-trade funds for use by the communities of El Dorado County will greatly assist our residents and commercial businesses in their efforts to address climate change and reduce GHG emissions. We encourage additional consideration for our and similar communities as explained below.

### **CalEnviroScreen Concerns**

Many rural communities in the Sierras no longer qualify under CalEnviroScreen as a DAC, despite current economic struggles. Much of the El Dorado County region is economically isolated and disadvantaged, with unemployment rates that have remained higher than state averages and incomes across the region in decline since 2010. Under the Department of Water Resources Disadvantaged Communities Mapping Tool, 59% of the Sierra Nevada region would meet the DAC classification (US Census Bureau).

Despite not meeting CalEnviroScreen pollution criteria, the Sierra Nevada/Lake Tahoe region suffers from unique environmental and public health conditions. Most of the air pollution on the west slope Sierra Nevada and in Tahoe is caused primarily from exhaust and emissions from California urban centers to the west, resulting in toxic “nonattainment” ozone levels, in violation of state, federal, and basin air quality standards. Wildfires and prescribed burns are additional unaccounted factors that affect the air quality of the El Dorado region. Wildfire-generated smoke emissions typically exceed all state and federal air quality standards and are capable of causing serious health problems.

CalEnviroScreen focuses heavily on pollution hazards that are specific to urban regions. As a result, the tool does not represent the external sources of pollution or 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 GHG reduction fund allocations.

### **Low-Income Communities Needs**

The El Dorado region of the Sierra Nevada is a unique area in California that spans rural towns and popular lake and mountain resort communities. Sections of our county qualify as low-income communities, including much of the

western and southern side of Lake Tahoe, as well as numerous communities on the west slope of the Sierra Nevada. As such, how CARB determines to incorporate the needs of low-income communities in future funding initiatives will be impactful to the EDCWA community.

EDCWA appreciates that California has expanded beyond its CalEnviroScreen identification of disadvantaged communities (DAC) to include needs of low-income communities. This change will allow rural communities, like those found in El Dorado County, access to funding support for GHG reduction strategies and technologies.

EDCWA would like to recommend that CARB maximize the allowable allotments of funds towards low-income communities. Low-income communities that do not overlap with DACs have been subject to a funding handicap, and this future funding will be crucial to rural low-income communities contributing with critical GHG reduction projects. EDCWA recommends developing funding solicitation criteria that will help ensure that low-income communities can catch up with this needed funding. This could include providing a percent allotment of funds dedicated to low-income communities and points for qualified low-income community applicants.

However, if the focus on DACs will remain and take precedence over low-income communities, then EDCWA would recommend that funding solicitations separate competition between DACs and non-DACs into their respective percent funding allotments. Non-DACs, which include El Dorado County rural communities, often cannot compete against the DAC preference points assigned under the evaluation criteria. Solicitation awards that do not separate the DACs from non-DACs in the competition pool do not create equitable access for non-DACs, including low-income communities, to acquire funds.

### **Population Requirements**

Rural, small counties, like El Dorado County, often struggle to compete against major metropolitan areas for funding and resource allocation. To more fairly balance the availability of funding between urban communities that qualify under the CalEnviroScreen pollution criteria and Sierra Nevada rural communities that do not qualify under those criteria, we request that a specific allocation, possibly 10 percent or more, of funds be dedicated to communities in those counties that qualify as rural under the California State Department of Finance (counties with populations of less than 200,000). This will help address the current inequities and other disadvantages that are particular challenges within our rural counties.

Rural communities in the Sierra Nevada also serve as popular visitor destinations, often exploding in population during peak seasonal periods. Tahoe must be able to support a significant influx of visitors, during both the summer and winter periods, with up to 24 million visitors each year, a tremendous increase from an estimated year-round resident population of 50,000 (Tahoe Transportation District 2016). Many of these visitors come via the El Dorado Highway 50 corridor, as visitors converge on Tahoe from the San Francisco Bay and Sacramento regions.

There is an inequitable burden placed on rural, resort local populations to support the visitor population and their resultant GHG contributions, as well as construct and maintain public works infrastructure. The visitor population equates to higher demands on the electrical grid and transportation infrastructure, loads that resort communities must have the capacity to support, but often due to a low resident population count, lack the funding to implement GHG reduction projects. CARB funding will help mitigate the added GHG burdens from these visitors, as such, visitor population impacts should be accounted for in funding criteria and allocations.

### **Investment in Clean Energy Technology**

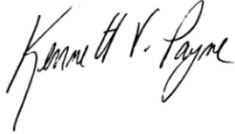
For El Dorado county, and given the nexus among water, energy, and transportation sectors and uses, investment in the following clean energy and energy efficiency technologies would be applicable and advantageous to our region: in-line small hydroelectric that uses existing water systems and gravity to generate energy, water as energy storage and other grid balancing operations, wastewater treatment energy recovery and generation technologies, energy efficiency equipment and process upgrades, solar photovoltaic projects, woody biomass utilization, and light- and heavy-duty electric vehicle deployment.

El Dorado is a rural, mountainous region that is heavily covered by forested land. Our boundaries include some of California's highest elevations and we tackle more severe weather, winter snow and cold temperatures, than the majority of California. Funding for demonstration projects is greatly needed and of significant interest to our

communities, as many emerging and established clean technologies have yet to be proven effective for challenging terrain and environments, like those found in El Dorado County and the Sierra Nevada.

Thank you for considering our comments and for the opportunity to submit recommendations to CalEPA and CARB regarding the public workshop on the Scoping Plan. We hope that CalEPA and CARB will take into account the needs of California's rural, mountainous communities.

Sincerely,

A handwritten signature in black ink, reading "Kenneth V. Payne". The signature is written in a cursive, flowing style.

Kenneth V. Payne, P.E.  
Interim General Manager

### **References**

Tahoe Transportation District 2016. Carl Hasty. Memorandum: Statement on Visitation Numbers and Data for Transportation Planning. September 10, 2016.

U.S. Census Bureau: QuickFacts for South Lake Tahoe, California. Retrieved January 7, 2016. Last Updated December 2, 2015. <http://www.census.gov/quickfacts/table/PST045215/0673108,06>

### **Copy:**

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