



The Watershed Research and Training Center

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Chairman Mary D. Nichols and CARB board
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Disadvantaged Communities designation fails to recognize forested communities

Dear Mary D. Nichols and fellow CARB board members,

We applaud the ARB's direction to invest Greenhouse Gas Reduction Fund monies in disadvantaged communities in California. It is imperative that when attempting to mitigate and adapt to climate change with public funding, we focus on those communities most at-risk from climate impacts and those who face the greatest barriers to implementing measures due to a lack of social, political and financial capital. However, the selected criteria used to designate Disadvantaged Communities notably and unreasonably omit rural forested communities who face both substantial climate-related impacts now and into the future, and suffer from some of the deepest socio-economic disadvantage outside of urban poor and agricultural communities. While they do not suffer the same non-climate-related industrial pollutions, they are deeply disadvantaged just the same.

The CalEnviroScreen data that CalEPA, OEHHA, and ARB developed for Agencies to identify Disadvantaged Communities precludes forested areas from being recognized. A rough review reveals that 8 of the 19 screening criteria used to rank census tracts to represent a spectrum of "disadvantage" are directly mitigated or minimized by sparse population and absence of industrial or agricultural development, which are not common problems for disadvantaged rural forest communities. Those include: Ozone, Pesticides, PM2.5, Toxic Releases, Diesel, Traffic Density, Drinking Water, Hazardous Waste. Several of these criteria have little to do with climate change agents and much to do with externalities of industrial processes, urbanization, and commercial agriculture. A visual comparison of the CalEnviroScreen map and a US Forest Service Forest Inventory map¹ show that with few exceptions, forested areas of the state rank low on the "disadvantaged" scale. See the final page of this letter for a side-by-side comparison.

Forested communities are disadvantaged in many ways that are not identified within the screening criteria. CalEnviroScreen screening criteria based on population characteristics can be fairly applied to both all populations, but the Pollution criteria based on traditionally urban problems such as traffic congestion/diesel/ozone emissions and hazardous waste should be removed or replaced with other criteria when evaluating rural areas to determine who is disadvantaged for the purposes of GGRF, which is about GHG reductions.

While living in or near the great forests in California does bring great benefits for rural forest communities, this should not keep their disadvantages from both climate impacts and generational

¹ Christensen, Glenn A.; Campbell, Sally J.; Fried, Jeremy S., tech. eds. 2008. California's forest resources, 2001–2005: five-year Forest Inventory and Analysis report. Gen. Tech. Rep. PNW-GTR-763. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 183 p.

poverty (and their attendant public health, education, economic, and other challenges) from being recognized. The ARB should consider additional criteria related to climate driven impacts. In particular, forest communities stand to suffer most from climate-driven wildland fire trends and from serving as headwaters for much of CA's urban and agricultural demand. Thus, rural forest communities suffer disproportionately from both warming and drought with current and future wildfire and water scarcity scenarios. Further, the recently published Short-Lived Climate Pollution Reduction Strategy concept paper identified Black Carbon as a significant short term climate driver, with over half of releases in California caused by wildfires, which disproportionately impact rural communities.

What's more, it is these rural and forested communities that CA most needs to mobilize as agents to mitigate and adapt to climate impacts. As stewards of CA's forests and headwaters, they are essential agents in mobilizing the workforce and will be necessary to reduce wildfire and watershed impacts, for both their own sake, and for the sake of urban and agricultural disadvantaged communities. The co-benefits in investing in rural forest communities are substantial.

We hope that ARB will consider refining their criteria to better incorporate the large segment of disadvantaged communities in CA that rural forest communities represent. They are now and will in the future continue to suffer the impacts of climate change, and they can also serve as part of the solution.

Regards,

A handwritten signature in cursive script, appearing to read "Nick Goulette".

Nick Goulette
Executive Director
The Watershed Research and Training Center

Visual comparison of the CalEnviroScreen map and a US Forest Service Forest Inventory map shows that most of the forested areas in California rank low on the “disadvantaged” scale. Forested parts of the state and those with low CalEnviroScreen rankings are both colored green.

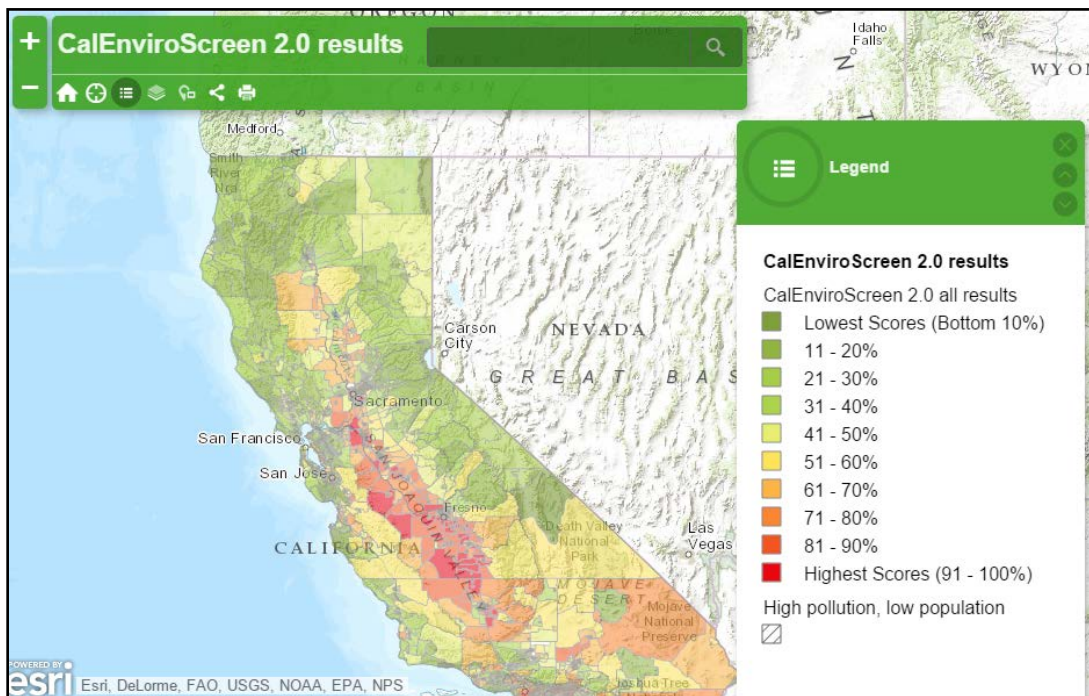


Figure 2 Screen shot of CalEnviroScreen database taken 6/26/2015



Figure 1 Map showing forest areas in California

Taken from Christensen, Glenn A.; Campbell, Sally J.; Fried, Jeremy S., tech. eds. 2008. California’s forest resources, 2001–2005: five-year Forest Inventory and Analysis report. Gen. Tech. Rep. PNW-GTR-763. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station. 183 p.