



El Dorado County Water Agency

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California Air Resources Board
Subject: 2030 Target Scoping Plan Discussion Draft

Dear CARB,

Please accept this comment letter from the El Dorado County Water Agency (EDCWA) in response to the California Air Resources Board 2030 Target Scoping Plan Discussion Draft. 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 reduction opportunities for our region. The El Dorado County region specifically and the Sierra Nevada in general are unique areas in California that span rural towns and popular lake and mountain resort communities. The 2030 Target Scoping Plan has the potential to significantly impact El Dorado County residents and commercial businesses in their efforts to address climate change and reduce greenhouse gas emissions.

Identifying Low-Income Communities

EDCWA recommends that the 2030 Target Scoping Plan not employ CalEnviroScreen to identify low-income, disadvantaged communities (DAC). 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.

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. 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. (DWR 2016, US Census Bureau)

Wildfires and prescribed burns are additional unaccounted factors that affect the air quality of the Sierra Nevada region. Due to past suppression tactics of naturally occurring wildfires, the continued drought epidemic, and the bark beetle infestation crisis, our forests are prone to severe wildfires, which can have massive air and water quality impacts. Pollutants from massive fires significantly impact water quality in our watersheds (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 help manage and reduce the likelihood of large-scale wildfires, but also represent challenges. 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, 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.

EDCWA recommends that the 2030 Target Scoping Plan not use the CalEnviroScreen criteria, especially when it references low-income communities, as this will result in the exclusion of economically disadvantaged rural communities in the Sierra Nevada. To identify low-income communities for program eligibility, EDCWA uses the California Department of Housing and Community Development's income guidelines and suggests that CARB reference these guidelines or the DWR Disadvantaged Communities Mapping Tool for the 2030 Target Scoping Plan implementation, where applicable.

Defining Population Requirements

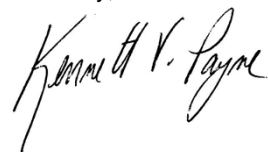
Rural communities in the Sierra Nevada also serve as popular visitor destinations, often exploding in population during peak seasonal periods. EDCWA advises that 2030 Target Scoping Plan implementation base any population requirements on both visitor and permanent population estimates, to more accurately account for recreation economy-based communities.

Visitor populations equate to higher demands on water systems and the electrical grid, loads that resort communities must have the capacity to support during seasonal fluctuations, but also represent opportunities for energy efficiency savings. There is an inequitable burden placed on rural, resort local populations to construct and maintain public works infrastructure services for the visitor population. As renewable energy and energy efficiency will help mitigate the added energy burdens of these visitors, their population impacts should be accounted for.

Additionally, performance or cost effectiveness criteria are often based off of urban areas, which may not adequately apply to rural areas. Rural communities can be at a disadvantage if they are compared against urban area baselines, due to differences in population density, particularly if visitor populations are not taken into account. EDCWA suggests that any cost effectiveness tests required by the scoping plan pull from data from both rural and urban communities.

Thank you for considering our comments and for the opportunity to submit recommendations to CARB on the 2030 Target Scoping Plan Discussion Draft. We hope that implementation of AB 32 will take into account the needs of California's rural, mountainous communities.

Sincerely,



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

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