

From: Carrie Monohan
Sent: Friday, September 05, 2014 1:31 PM
To: Peters, Laura@DWR
Subject: Definition of Disadvantaged Communities

Dear Laura Peters

I am writing regarding the draft PSP for DWR's Water-Energy Grant.

I would like to register my organization's concerns about the use of the CalEnviroScreen 2.0 Tool in assessing Disadvantaged Communities for the purpose of the grant. The tool is still under development and currently contains no DACs in our region - not because there isn't persistent rural poverty and disadvantaged communities, but because there is not enough documentation available to establish DAC status in our region. This puts our region at an unfair disadvantage when applying for grant funds like the Water-Energy grant. We urge that you use the DAC status determined based on the DAC definition provided in DWR's Proposition 84 and 1E IRWM Guidelines
<http://www.water.ca.gov/irwm/grants/docs/Archives/Prop84/Guidelines_PSPs/GL_Final_07_20_10.pdf>, dated August, 2010.

Specifically:

Many of the criteria used to build the CalEnviroScreen tool relate to public health issues which are skewed towards urban metropolitan areas and involve measures that are not being taken in many rural areas thereby excluding them.

The new tool has been developed without enough or appropriate data for the whole Sierra region, hence the omission. For example, it finds no impaired water bodies in the Sierra based on NUMBER of pollutants - not the criteria used by the EPA in finding waterbodies impaired under 303 (d) listings under the Clean Water Act

Thank you for considering these concerns as you proceed with IRWMP planning in California.

Best Regards
Carrie Monohan
Science Director
The Sierra Fund