



CalEnviroScreen
 c/o John Faust, Chief, Community Assessment & Research Section
 Office of Environmental Health Hazard Assessment
 1515 Clay Street, Suite 1600
 Oakland, CA 94612

RE: CalEnviroScreen 2.0 Comments from Advocates Coalition for Coachella Valley Community and Environmental Health

The undersigned organizations thank OEHHA and CalEPA for their continued commitment to creating a comprehensive tool to identify, assess and build strategies to address cumulative vulnerabilities based on environmental and demographic factors. Our organizations are part of the Building Healthy Communities (BHC) partnership and the Advocates Coalition for Coachella Valley Community and Environmental Health (Advocates Coalition).

We submit the following comments to help inform California Communities Environmental Health Screening Tool: CalEnviroScreen 2.0 (CalEnviroScreen 2.0, CalEnviroScreen or Screening Tool) based on our collective experiences in the ECV.

While we are concerned that CalEnviroScreen 2.0 does not accurately reflect the true vulnerability of the East Coachella Valley, we are particularly concerned given our understanding that results from the Screening Tool will likely guide significant investment and environmental protection activities throughout the state - investment and protection that is so critical if the ECV is going to develop into a healthy, sustainable region.

Air Quality data does not accurately reflect the vulnerability of the East Coachella Valley

We do not believe that air quality data, in particular data for the PM 2.5 indicator, and secondarily data for the diesel indicator, accurately reflects air quality in the East Coachella Valley. CalEnviroScreen apparently relies on just one PM 2.5 monitor, a neighborhood scale monitor located upwind from the ECV in the City of Indio¹. We believe that the 2.5 indicator for the East Coachella Valley communities - measured by percentile at an almost uniform 11.24 to 13.02 across 12 census tracts - is inaccurate and underestimates the vulnerability of the

¹ See (http://www.arb.ca.gov/qaweb/site.php?s_arb_code=33157 , last viewed 5/28/2014).

region. Considering the proximity of several ECV census tracts to State Routes 86 and 111, the indicators for diesel exposure also seem low.

CalEnviroScreen should identify mechanisms to more accurately assess communities that have insufficient monitoring, or consider eliminating the indicator for those communities for which no sufficiently accurate data exists. Concurrently, the State should identify those regions with inadequate air quality monitoring and place monitors in those regions as expeditiously as possible.

Groundwater Threats Could Be More Comprehensive

The Groundwater threats indicator assess only a handful of threats to groundwater and could be more robust if it considered other threats, such as non-point sources, failing septic systems agricultural discharges. We are also concerned that the Screening Tool does not take into account groundwater threats from facilities and waste sites on tribal land.

Drinking water quality indicator weighted by large census tracts in rural regions

It is our view that the drinking water data – and methodology used to develop that data - is the most advanced, aggressive and accurate assessment of drinking water quality that has been developed at the state level to date. This information is a critical new indicator in this version of the Screening Tool, and, moreover will guide statewide and local decision-making regarding resource allocation and planning.

We believe, however, based on our understanding of the methodology and the indicator results, that the drinking water indicator obscures the vulnerability of small communities, mobile home parks and individuals reliant on often untreated groundwater and may also exclude data from some communities.

Much of the unincorporated areas of the Eastern Coachella Valley is served by the Coachella Valley Water District (CVWD) and sits within CVWD's district boundaries. The district boundaries, though, extend beyond its service area. Many homes, therefore, while within the political boundary of the district do not receive drinking water from CVWD but instead receive drinking water in most cases from untreated or inadequately treated groundwater sources. It is unclear if CalEnviroScreen captures data from those wells located within CVWD's boundaries that supply drinking water to residents that are not connected to CVWD water. OEHHA should take a closer look at the CVWD's service map to assess whether or not the Screening Tool has captured drinking water quality for all communities within the district boundaries.

Population weighting also obscures among the most vulnerable communities: those small communities reliant on untreated or inadequately treated groundwater from individual wells, mobile home parks, state small systems and small community systems. The Coachella Valley Integrated Regional Water Management Plan, developed last year, illustrated through both data and perceptions of longtime residents that high levels of contamination, including arsenic and hexavalent chromium, prevail in the East Coachella Valley. Given the degree of variability with respect to the quality of delivered drinking water, it seems inaccurate that many East Coachella Valley census tracts all score at approximately the 67th percentile on the drinking water indicator. To the extent that the majority of a given census tract is served by a larger system that treats water prior to delivery, the vulnerability of small communities reliant on contaminated water is not as apparent as it must be to demonstrate the real vulnerability of individuals and communities.

Artificially low percentile for Low Birth Weight and Asthma Indicators

Asthma indicator Underestimates Asthma Incidence in the East Coachella Valley

We strongly believe that the Asthma Indicator severely undercounts the incidence of asthma in the East Coachella Valley. The Asthma indicator is based primarily on data sourced from emergency department visits, yet the East Coachella Valley is far from the nearest emergency department and it is likely that many residents do not use the emergency department for asthma related ailments. The Screening tool should adjust for this deficiency by increasing data sets to more accurately determine asthma rates, by controlling for distance from emergency departments, or by some other means.

Low Birth Weight Indicator Also Demonstrates Surprisingly Low Percentiles

We are also concerned that the Low Birth Weight (LBW) indicator provides inaccurately low results for ECV communities. For example, census tract 6065045605 which represents unincorporated Riverside County, had a LBW percentile of 0.31%. While some residents may give birth at home, we believe that a far greater driver of the inaccuracy is the exclusion of mothers from the data set who provide Post Office (P.O.) boxes for their mailing address. In the ECV, many residents reside in mobile homes and depend on P.O. boxes for reliable delivery of mail. We recommend that OEHHHA corrects for this deficiency or eliminate the indicator until a more reliable data set is available.

Unemployment Data may not account for seasonal employment

We applaud the inclusion of unemployment as an indicator and believe that data from the ACS, notwithstanding its deficiencies especially in small communities, better accounts for unemployment trends than data from the Employment Development Department. We do think, that if there is data adequate to do so, the Screening Tool should account for seasonal employment as a component of this indicator. Seasonal employment, at least in the context of agriculturally based communities, adds substantial vulnerability due to irregular income and unreliable employment.

Ensure adequate monitoring of environmental hazards on tribal lands reflect the real burden to vulnerable communities in the CalEnviroScreen scoring system.

We are concerned that data sets² that underlie CalEnviroScreen 2.0 do not sufficiently assess the impact of environmental hazards located on or generated by tribal land. Exclusion of some or all of the impacts from tribal land and / or different methodology to assess environmental impacts and effects of uses on tribal land likely impact the following indicators:

- Groundwater Threats
- Toxic Release
- Hazardous Waste

² These datasets include the EnviroStor Cleanup Sites Database (maintained by the Department of Toxic Substances Control (DTSC)), the EnviroStor Hazardous Waste Facilities Database (maintained by DTSC), the GeoTracker Database (maintained by the State Water Resources Control Board), and the Solid Waste Information System (maintained by CalRecycle).

We recommend that CalEPA and/or OEHHA comprehensively assess and include data from land uses on tribal land to ensure that full inclusion of environmental impacts in CalEnviroScreen 2.0.

Additional indicators to consider

We understand that there are many factors and indicators that impact individual and community health. With that in mind, though, we offer the following suggestions of indicators that impact health in the East Coachella Valley and likely throughout the state:

Substandard infrastructure and Inadequate Basic Services such as unsafe pedestrian facilities, inadequate wastewater / sanitation services and inadequate public transit.

Inadequate Supply of Affordable, Quality Housing

Housing stability and quality have been linked to health outcomes. OEHHA should consider including a housing indicator or indicators in further iterations of the Screening Tool.

Economic Well-being

Economic well-being is tied to health outcomes as well. The poverty indicator is an important indicator of social vulnerability but OEHHA should consider other indicators such as those that demonstrate deep poverty (e.g. 100% as compared to 200% of the federal poverty line) as well as a wealth / asset indicator to the extent that adequate data exists.

Reliance on ACS data likely impacts the accuracy of results in the rural, East Coachella Valley

Census and especially American Community Survey Data often lacks accuracy in rural and agricultural regions. We have seen margins of error at as high as 100% for certain income and economic data in rural communities. While we are not aware of alternative data sets that exist, OEHHA should identify any mechanisms available to correct for data deficiencies in rural areas and at the very least acknowledge that data deficiencies in rural regions serve as a limitation with respect to some indicators.

Conclusion

OEHHA and CALEPA have done exceptional work in outlining major environmental concerns statewide and in turn, have raised public awareness and redefined existing mechanisms for resource allocation. The above comments exemplify many ways in which the ECV is the largest disfranchised community in Riverside County with major environmental cumulative impacts. In June of 2013, UC Davis through a partnership with Center for Integrated Rural Studies (CIRS) worked with the Advocates Coalition to document the unrevealed patterns of cumulative environmental vulnerability in the Eastern Coachella Valley (ECV). The resulting publication, "Revealing the Invisible Coachella Valley³" is a compilation of available public data sets for Riverside County. The report reveals that residents in the ECV face significant and overlapping environmental hazards and social vulnerability that far exceed perceptions.

³ For a complete copy of the report please see: <http://regionalchange.ucdavis.edu/ourwork/publications/ceva-ecv/revealing-the-invisible-coachella-valley-putting-cumulative-environmental-vulnerabilities-on-the-map>

As the report indicates, there are major environmental justice issues such as; air quality, limited health care access, failing water infrastructure, lack of public transportation, hazardous waste and illegal dumping, substandard housing, and concentrated poverty.

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We again thank OEHHA and CalEPA for the tremendous work that has contributed to the Screening Tool and for consideration of our comments. We look forward to working with you on this, and future iterations of the CalEnviroScreen, as well as other efforts to create stronger, healthier East Coachella Valley.

Sincerely,

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