CALIFORNIA
ENVIRONMENTAL
JUSTICE ALLIANCE

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VIA ELECTRONIC MAIL
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Re: **California Environmental Justice Alliance Comments on Draft California Communities Health Screening Tool: CalEnviroScreen Version 2.0**

The California Environmental Justice Alliance ("CEJA") strongly supports the CalEnviroScreen 2.0 tool. We see it as an important step forward in the state's understanding and analysis of cumulative impacts, and congratulate the California Environmental Protection Agency (CalEPA) and the Office of Environmental Health and Human Hazard Assessment (OEHHA) on their hard work on the tool. We are particularly pleased with the following aspects of the second version:

- Inclusion of the drinking water indicator. We congratulate the team at OEHHA for developing an indicator on this complex, but important, issue.
- Analysis at the Census Tract level. Ensuring an appropriate geographic scale is critical to the success of the tool, and we believe Census Tracts is indeed an appropriate scale.
- Inclusion of unemployment. This indicator helps create a strong socioeconomic vulnerability component in the tool.
- Inclusion of hazard proximity analysis in some indicators. This type of analysis is critical to capturing the multiple exposures that communities face, whether or not they are located in the same Census Tract of a point source.

We offer the following **recommendations for immediate changes to the tool, before it is used in any policy settings.**

Release Regional Rankings. CalEPA and OEHHA should supplement statewide ranking of census tracts with regional scoring and ranking of census tracts within each region. Region-level ranking could: (a) correct for regional characteristics that create severe disadvantages for communities but are masked in statewide ranking; and (b) provide guidance to local, regional and state agencies in developing investment policies and allocating resources in a way that better meets localized

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needs. The addition of a regional score would serve to highlight regional trends and issues that may be masked by statewide ranking. This approach would also be able to correct for factors that vary widely by region, such as cost of living.[1] Regional rankings would also help to guide investments to the most severely disadvantaged communities in each region for any investments that may end up flowing through regional or sub-regional agencies.

Regions should be determined using the same methodology used in the Environmental Justice Screening Methodology. This approach has already been approved by the California Air Resources Board. It uses the four regional planning areas already defined (Southern California Association of Governments, San Diego Association of Governments, Sacramento Area Council of Governments, and Association of Bay Area Governments) and divides up the remaining counties according to air basins. The result is a division of the state into 10 different regions. A map of these regions is attached as Appendix A.

Ensure that the drinking water indicator is based on the most health-relevant metrics*.* Maximum Contaminant Levels (MCLs) are developed based on economic and infrastructure considerations and therefore should not be used to generate a toxicity-weighted metric or score. The Public Health Goals (PHGs), on the other hand, are based on health-focused studies and provide for a better benchmark of drinking water, which can put communities at risk. Therefore, the PHGs are more relevant for inclusion in the drinking water indicator and any modifications to the version included in EnviroScreen 2.0, must equally identify those communities most at risk from health impacts from contaminants in drinking water.

In addition, we offer the following **recommendations for changes for CalEPA to explore in the coming year.**

Additional Indicators. We understand the need to limit the number of indicators to keep the tool relatively straightforward. However, for the tool to accurately identify the state's most overburdened communities, it should include a *select number* of additional indicators, to be developed over the course of the coming year. We recommend the following types of indicators be explored:

Housing vulnerability. Access to safe, affordable housing is a critical environmental justice issue. Possible housing indicators to explore are: percent of household income that residents spend on housing and transportation, rent burden, overcrowding, and severe housing cost. CES

[1] Another approach that would specifically address variations in the cost of living would be to base poverty levels on Area Median Income ("AMI").

Socioeconomic vulnerability. CalEPA should incorporate one additional indicator of socioeconomic vulnerability in the coming year to continue strengthening the socioeconomic indicators, which was severely weakened with the removal of race. While adding the unemployment indicator was a good step towards accurately capturing the full range of socioeconomic vulnerabilities, we strongly feel another is needed. We recommend exploring Single Parent Households or indicators of community assets for inclusion.

Climate change. The impacts of climate change will be a critical issue for communities to contend with in the coming years, and we know that low-income communities and communities of color will be hit first and worst and have least resources to adjust to climatic changes. CalEnviroScreen's assessment of where the most vulnerable communities are located could greatly enhance the statewide conversation on where climate adaptation efforts and investments should be focused, and we recommend CalEPA to begin to consider the development of an indicator on climate change in the next year.

Continue to improve inclusion of land-use data. Land-use remains an important driver in environmental exposure. While version 2.0 has made improvements by incorporating a hazard proximity analysis for some indicators, the actual types of land-uses within communities across California is still absent from the tool, despite the strong scientific correlation with health and environmental quality. It is our understanding that the Environmental Justice Screening Methodology team has systemized their methodology for incorporating land-use data, and we encourage CalEPA to explore the feasibility of including their land-use methodology into CalEnviroScreen.

Finally, we offer these **recommendations regarding the use of the tool in statewide policy**. We believe the tool will have many important policy uses, including but by no means limited to distribution of resources. We encourage CalEPA to follow some basic principles when considering use of CalEnviroScreen in policy settings.

Ensure meaningful impact. CalEPA should ensure that any program using CalEnviroScreen is meaningfully addressing on-the-ground problems in highlighted communities. We do not want to see CalEnviroScreen used as a means to superficially ensure that environmental justice needs are being met. Just because a program has activities or allocated funding in the most impacted Census Tracts does not *necessarily* mean that it is addressing critical equity issues (though in some cases this maybe a sufficient measure). CalEPA should work with interested agencies to ensure that programs using the tool are implementing activities within the communities highlighted by CalEnviroScreen *and* addressing the core equity issues in these communities, within the purview of their programs.

Allow for flexibility. CalEPA should be flexible in ways the CalEnviroScreen tool is used. In particular, CalEPA should explore using CalEnviroScreen in conjunction with other indicators to identify vulnerable communities and explore using subsets of the CalEnviroScreen indicators where appropriate.

For some program purposes, there is a strong policy case to be made that program activities should focus on the most impacted Census Tracts identified by CalEnviroScreen. For example, environmental enforcement activities should be targeted in the communities most impacted as identified by the CalEnviroScreen tool. However, for other policy purposes there may be a clearer benefit to providing a specified set of indicators for identifying highly impacted communities. Recently, the Active Transportation Program adopted guidelines that will direct the 25% of program funding for disadvantaged communities. They used this "menu of options" approach and their funding will identify communities that meet any one of three criteria: identification by the CalEnviroScreen tool, percent of the population at or below 80% Median Household Income, or areas where 75% of students are eligible for free lunch programs.

Another area where CalEPA should be flexible is in allowing agencies to "customize" their use of CalEnviroScreen. For example, in some settings it may make more sense to only look at one set of indicators rather than all the indicators included in CalEnviroScreen.

We believe such flexible approaches towards the use of CalEnviroScreen may have significant benefits depending on the policy context, and encourage CalEPA to adopt such an approach as the uses of the tool are explored for use in a wider range of venues.

We appreciate the opportunity to comment on this update to the CalEnviroScreen tool, and we look forward to working with CalEPA to develop a robust cumulative impacts tool that will allow the state to better identify and serve its most vulnerable and polluted communities.

Sincerely,

/s/

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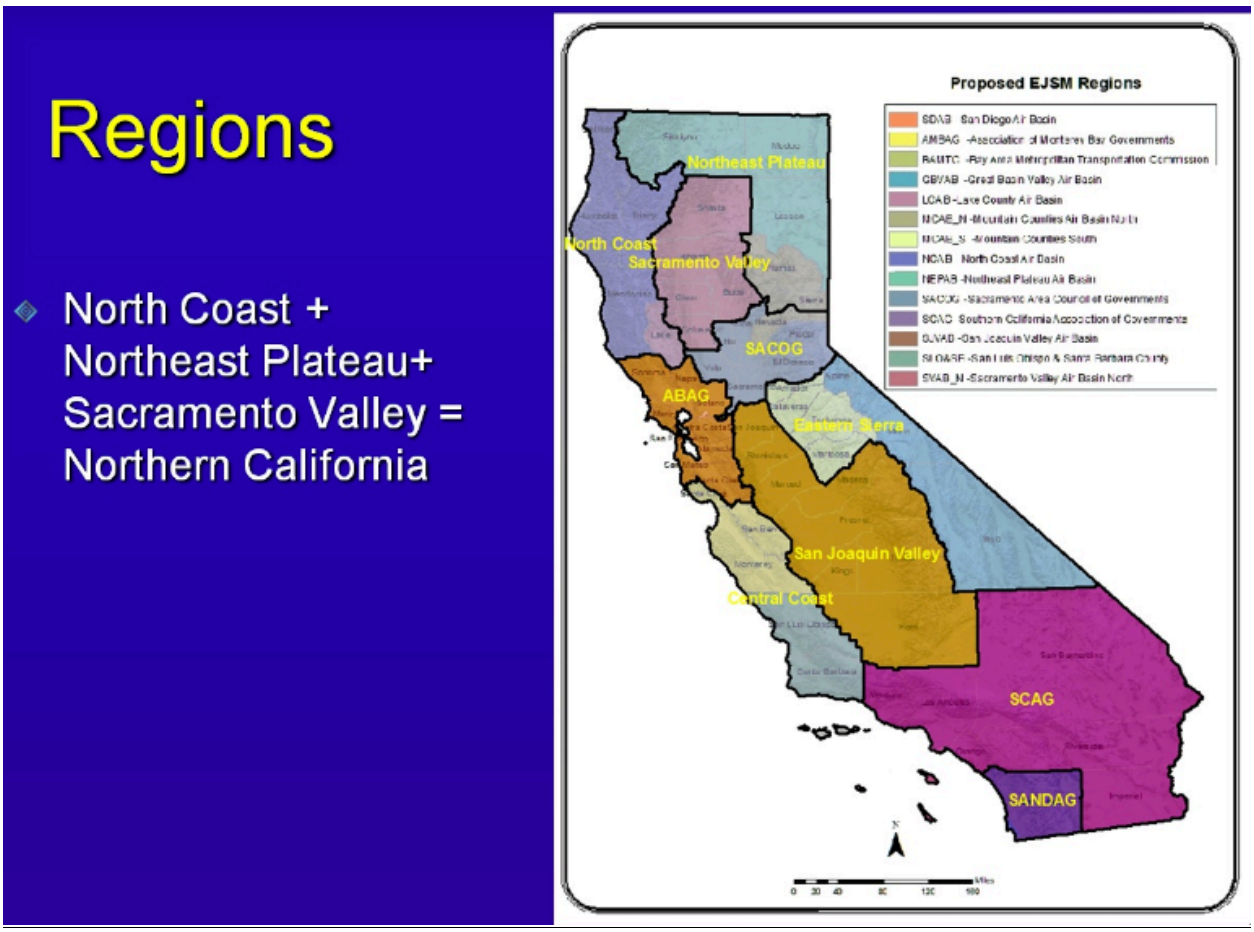
APPENDIX A

Map of Regions to Be Used for Regional Rankings, as developed by the Environmental Justice Screening Methodology team
(Manuel Pastor, Jim Sadd, and Rachel Morello-Frosch)