



June 2, 2014

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 Public Comments

The City of Richmond is presented with many challenges including an increased exposure to many air pollutants and toxic environments, high rates of asthma, and a predominantly low income and minority population. The City is on the forefront of evaluating and acting on health disparities that exist within our community through our adoption of a Health in All Policies Strategy and Ordinance. Through our innovative work to improve community health, we've built a knowledge base that has led us to believe that CalEnviroScreen 2.0 does not adequately acknowledge vulnerabilities that exist in Richmond. Only 3 census tracts fall within the top 20 percent, and none are in the top 10 percent. With the presence of the Chevron Refinery, one of the largest in the State, as well as a large commercial port, railroad yards, a landfill, numerous manufacturing, assembly and warehousing businesses and three major highways (I-80, I-580 and the Richmond Parkway), there are some areas of the tool that are not sufficient to capture the true vulnerability our residents experience. In specific, we have four main comments that pertain to both Richmond specifically and more broadly around the methodologies used in the CalEnviroScreen 2.0.

One major concern is that only those solid waste facilities that process more than 3,000 tons of waste per day are measured as an area polygon, while distances from all other landfills are just measured from one central point location. This method doesn't capture their true impact, and consequently excludes tracts impacted by these relatively smaller, but still substantial, facilities. In Richmond, the Golden Bear Transfer Station and West County Sanitary Landfill, for example, is almost a mile long. Measuring from the center of the landfill versus the outer area will capture a much smaller area than what actually falls within the 1000m meter buffer the tool uses as their outer limit.

Within the tool, there is also no way to capture the occurrence of accidents or other large events, like fires, floods, or other similarly impactful incidents. Fires are a significant source of

particulate matter. The 2012 Chevron Refinery fire resulted in a massive increase in air pollution including a significant spike in particulate matter, sending more than 15,000 people to the hospital. Low income and minority populations, like those located closest to these facilities, are the hardest hit by these accidents. Yet surprisingly, the census tract adjacent to the refinery is not within the top 20 percent.

More broadly, the data used to measure air quality (particulate matter, ozone, and diesel), are collected by CARB on regional level, and are intended to provide a regional perspective. Therefore, these data are now inadequate for such a localized scale utilized by the new CalEnviroScreen 2.0. In Richmond, no census tracts register any ozone levels above the standard, none go higher than the 20th percentile for PM 2.5 levels, despite the high level of industrial and vehicle activity. There also isn't a CARB air monitoring station within the city that measures either PM or ozone, and only one in the general vicinity that does measure these pollutants. The next closest stations are 10 miles and 30 miles away.

Lastly, one of the biggest concerns in Richmond is regarding census tract 6013377. This is the tract directly adjacent to the Chevron Refinery and bordered by a major traffic thoroughfare, yet it does not fall within the highest 20 percent. The ozone and PM 2.5 for this tract are both surprisingly low (0 and 18th percentile), which may be a direct product of the regional air monitoring addressed above.

Overall, the City of Richmond is concerned that this new tool does not reflect the true vulnerability residents face. We believe some changes should be made to the new version of the CalEnviroScreen to accurately reflect our community's high burden of multiple pollution sources.

Thank you for taking the City's concerns into consideration.

Sincerely,



Mayor McLaughlin
City of Richmond