



Finding the ways that work

February 1, 2013

John B. Faust, Ph.D., Chief
Community Assessment and Research Section
Office of Environmental Health Hazard Assessment
151 Clay St., Suite 1600
Oakland, CA 94612

Re: Comments on the Second Public Review Draft of the California Communities Health Screening Tool (CalEnviroScreen)

Dear Dr. Faust,

Thank you for the opportunity to comment on the second public review of the draft CalEnviroScreen. We believe this is a key resource that will help identify communities who are facing multiple environmental and socio-economic impacts and direct investments that will promote and strengthen the goals of the California Global Warming Solutions Act, AB 32, and other related policies.

As a science-based environmental organization, we believe climate change is one of the most pressing issues threatening the health and safety of all communities. Disadvantaged communities with the least access to health care and other services often bear the worst of many climate related impacts – too often these are the same communities who suffer from poor access to clean air and water, and live in close proximity to polluting sites which include port facilities, oil refineries, waste facilities, and major highways.

While fighting climate change and improving air and water quality are critical for California's vulnerable populations, these communities also need jobs and investments to spur economic growth. This is precisely why we support investments that provide a "triple bottom line" that can benefit the environment, the local economy, and the health and safety of disadvantaged communities already feeling disproportionate impacts of pollution.

For all these reasons, it is critical to have a tool that can identify through a scientifically-rigorous analysis the communities who are most needy and direct investments in those communities accordingly. We fully support OEHHA's second draft of the CAIEnviroScreen, and commend the agency's commitment to transparency and public participation. In addition to the scientific metrics already used in the screening tool, we offer two suggestions:

- Utilizing federal census data to increase the granularity of available information and also provide access to new tools such as tracking communities with low access to health care

services, this can be accessed publically through the Center for Medicare and Medicaid Services, at <http://www.cms.gov/Outreach-and-Education/Outreach/HIMarketplace/Census-Data-.html>.

- Working with academia to catalogue regions most at-risk for extreme weather, including extreme heat waves. An example of this scholarly work is being piloted by the University of California, Los Angeles, and can be accessed at <http://c-change.la/temperature/>.

Including these metrics in future versions of the tool can help ensure an even more accurate and robust assessment of environmental impact and other risk-factors.

Thank you for the opportunity to comment on this version of the CalEnviroScreen, we believe it is an important step toward promoting equity and strengthening the goals of AB 32. We look forward to working with the Office of Environmental Health Hazard Assessment (OEHHA) and other stakeholders to continue to develop this effective and data-driven tool for assessing investment priorities.

Sincerely,

Jorge Madrid
Policy Fellow, US Climate and Energy
Environmental Defense Fund

Erica Morehouse
Staff Attorney
Environmental Defense Fund