



GATEWAY CITIES
COUNCIL OF GOVERNMENTS

Artesia

Avalon

Bell

Bellflower

Bell Gardens

Cerritos

Commerce

Compton

Cudahy

Downey

Hawaiian Gardens

Huntington Park

La Habra Heights

La Mirada

Lakewood

Long Beach

Lynwood

Maywood

Montebello

Norwalk

Paramount

Pico Rivera

Santa Fe Springs

Signal Hill

South Gate

Vernon

Whittier

County of Los Angeles

Port of Long Beach

January 25, 2013

Mr. John Faust
Office of Environmental Health Hazard Assessment
1515 Clay Street, Suite 1600
Oakland, CA 94612

Dear Mr. Faust:

**Additional Gateway Cities Concerns Regarding CalEnviroScreen
Proposed Screening Tool**

Thank you for considering the concerns of the Gateway Cities regarding the proposed CalEnviroScreen impact screening tool, as expressed in our previous correspondence of October 16, 2012, and December 12, 2012.

In addition to the concerns expressed in our earlier letters, the Gateway Cities would like to offer the comments discussed below. The Gateway Cities COG is a joint powers authority representing 27 cities in Southeast Los Angeles County, as well as unincorporated communities of Los Angeles County. Our diverse communities total about 2 million residents, including many minority and low-income residents. The COG's mandate on behalf of its members includes improving transportation, air quality, housing and economic development.

Our key concern is that the CalEnviroScreen tool and related guidance should leave open the option for local and regional agencies to supply improved and more detailed information. This should be outlined in the preface materials. To that end, we suggest incorporating language into the preface as follows (the revised language is underlined):

"Potential uses of the tool at the state level include administering environmental justice grants, promoting greater compliance with environmental laws, prioritizing site-clean-up activities, and identifying opportunities for sustainable economic development in heavily impacted neighborhoods. During our outreach efforts we discovered that individual communities and groups of communities had collected addition and improved data. Cal/EPA is committed to working to refine the tool

Mr. John Faust
January 25, 2013
Page 2

with this improved data. Other government entities and interested parties may identify other uses of this tool and the information it provides. However, the screening tool is not intended to create a legal obligation to conduct additional detailed cumulative analyses for the staff reports written for individual rulemaking at the State and local government level.”

Lastly, we remain concerned that the use of the CalEnviroScreen tool as currently proposed could result in red-lining of high-scoring communities, making it hard to implement projects in the areas where the need is greatest. As can be seen in the updated documentation for the tool, the Gateway Cities, in Southeast Los Angeles County, are home to many of the state’s highest-scoring communities. We understand that the League of California Cities submitted a letter to Cal/EPA on January 14, 2013, regarding the CalEnviroScreen tool. We support the points made in the League’s letter with regard to the red-lining issue, as well as additional concerns expressed regarding the relationship of CalEnviroScreen to CEQA.

Thank you again for considering our concerns. We look forward to working with you to ensure local governments have the tools they need to create healthy, prosperous communities.

Sincerely,



Richard Powers
Executive Director

cc: Board of Directors, Gateway Cities COG
City Managers Steering Committee, Gateway Cities COG
Mr. Arsenio Mataka, Cal/EPA
Mr. George Alexeeff, OEHHA