



GATEWAY CITIES
COUNCIL OF GOVERNMENTS

October 16, 2012

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

Dear Mr. Faust:

Comment on CalEnviroScreen Proposed Screening Tool

The Gateway Cities Council of Governments (COG) welcomes the opportunity to submit our comments on the proposed CalEnviroScreen tool for identifying environmental justice communities within the state. 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 transportation, air quality, housing and economic development.

The Gateway Cities COG shares the concerns expressed by other commenters on the proposed model. In particular:

- The relative weights of the various factors used in the tool appear to be arbitrary and subjective. It has been our experience that in order to avoid controversy and to constructively inform policy makers, such tools should be transparent and objective.
- The Gateway Cities, as mentioned above, are home to many low-income residents, to whom affordable housing is particularly important. Our median household income is lower than that of the six-county Southern California Association of Governments region and that of Los Angeles County. If the tool is used in CEQA analyses, we share the concern that it could serve as a disincentive to the development of affordable housing, or to other development that might otherwise boost the prospects of areas that may now be lagging. This "redlining" effect, even if unintentional, could be detrimental to many Gateway Cities.

Thank you again for the opportunity to submit these comments on the proposed CalEnviroScreen tool. We look forward to reviewing a revised proposal when it is made public.

Sincerely,

Richard Powers
Executive Director

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