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January 29, 2013

Cal Enviro Screen
c/o John Faust Chief, Community Assessment & Research Section
Office of Environmental Health Hazard Assessment
1515 Clay Street, Suite 1600
Oakland CA 94612
Sent via email to: CalEnviroScreen@oehha.ca.gov

We write to express our support for the concept of using this tool to direct public investment, enforcement, regulation and remediation for low-income and disadvantaged communities disproportionately impacted by pollution and request that Cal EPA use clear, unequivocal and unambiguous language to ensure that this tool is NOT used to block community development and improvements and thereby cause even further financial distress to our most impacted communities and vulnerable populations.

We were encouraged by the language in the January 3, 2013 memo to the Cumulative Impacts and Precautionary Approaches Work Group that says:

[T]he results generated by CaiEnviroScreen are not intended (emphasis added) to be used for California Environmental Quality Act (CEQA) purposes.

Please make the statement less ambiguous by stating that the screen is "inappropriate for CEQA purposes." It would be perverse and inexcusable if this screen discourages the development of grocery stores, parks, affordable housing, and new schools in the very disadvantaged communities that most need those resources and amenities.

Unfortunately, California has a sordid history of steering polluting industries to low-income communities. Higher regulatory burdens on positive public and private investments in impacted communities will exacerbate the problem that this tool is setting out to correct.

We are very hopeful that this screening tool will help improve the quality of life in communities that have been disproportionately impacted by pollution. The goal should be to clean up the environment in these communities not redline and block opportunities for community development, investment and improvement through abuse of CEQA.

Sincerely,

Evelyn Stivers
Field Director