



October 21, 2016

Honorable Matt Rodriquez, Secretary
California Environmental Protection Agency (CalEPA)
1001 I Street
P.O. Box 2815
Sacramento, CA 95812-2815

Dr. Lauren Zeise, Acting Director
Office of Environmental Health Hazard Assessment (OEHHA)
P.O. Box 4010
Sacramento, CA 95812-4010

Subject: Comments on CalEnviroscreen 3.0 (CESv3)

Dear Secretary Rodriquez and Director Zeise:

I am writing to provide comments on the Office of Environmental Health Hazard Assessment's (OEHHA's) draft version of CalEnviroscreen (CESv3.) CESv3 is a draft, updated version of a statewide screening tool (California Communities Health Screening Tool) used to identify disadvantaged communities (DACs.) It is our understanding that CES has been adopted for use in prioritizing investments of Cap & Trade auction proceeds.

The Port joins with other agencies in expressing its concern that the CESv3 methodology results in a far too narrow definition of DACs. If adopted for use in its current form, CESv.3 would result in the exclusion from funding consideration of many urban communities, which are identified under other studies and programs as environmental justice communities, i.e., communities that suffer a disproportionate burden of adverse regional environmental impacts.

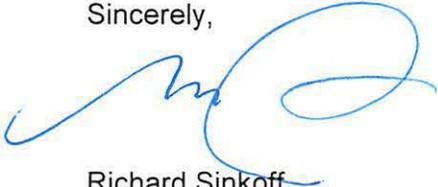
As you are well aware, the West Oakland community is adjacent to the Oakland seaport. In 2009, the Port of Oakland, in collaboration with the BAAQMD, ARB, seaport industry and the West Oakland community, developed the Port of Oakland *Maritime Air Quality Improvement Plan* (MAQIP) to reduce diesel particulate matter (DPM) emissions from Port-related sources and to reduce related health risk. The Port recently completed its 2015 port emissions inventory, which shows a 76% decline in total Port-related DPM over the 2005 baseline. We are confident that our continued efforts to reduce DPM are playing a beneficial role in improving air quality and health status in the West Oakland community.

For this reason, the Port is concerned that the CESv3 model might result in the diversion of potential funding for air quality programs and related initiatives from urban communities, such as West Oakland. Given the continued important emissions reductions work that lies ahead, we strongly urge OEHHEA to revisit its CESv.3 model so that all environmental justice communities in California can benefit from available and prospective funding.

Honorable Matt Rodriguez, Secretary
Dr. Lauren Zeise, Acting Director
October 21, 2016
Page 2

Thank you for the opportunity to comment on the draft version of CalEnviroScreen (CESv3). If you have any questions regarding these comments, please do not hesitate to contact me at 510-627-1182 or rsinkoff@portoakland.com.

Sincerely,



Richard Sinkoff
Director of Environmental Programs and Planning

Cc: Matthew Davis, Director, Governmental Affairs