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File Number 7300400

Mr. Matthew Rodriquez
 Secretary
 California Environmental Protection Agency
 1001 I Street
 P.O. Box 2815
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Dear Mr. Rodriquez:

SUBJECT: Comments on Update to the California Communities Environmental Health Screening Tool (Proposed CalEnviroScreen 3.0)

The San Diego Association of Governments (SANDAG) appreciates the opportunity to comment on the update to the California Communities Environmental Health Screening Tool (Proposed CalEnviroScreen [CES] 3.0).

As the Metropolitan Planning Organization for the San Diego region, SANDAG serves as the forum for regional decision-making and is committed to promoting social equity and environmental justice in the regional planning process. SANDAG makes significant efforts to ensure meaningful public involvement to help bridge the gap between policy makers and traditionally underrepresented communities.

Given the increasing role of CES in determining the use of state funds, the final version of CES 3.0 will have a direct impact on the ability of SANDAG and other community partners to utilize certain funding streams in support of San Diego's most impacted and disadvantaged communities. As such, SANDAG appreciates the efforts taken by the California Environmental Protection Agency (CalEPA) to incorporate data in the Proposed CES 3.0 that helps to provide a more accurate representation of San Diego's communities along the border. SANDAG offers the following recommendations as opportunities for further improvement.

Recommendations

SANDAG requests that additional data sources be incorporated in the Proposed CES 3.0 to better reflect asthma and heart attack prevalence in the region. It appears that data from the Veterans Administration and military hospitals are not included in the calculation of asthma and heart attack prevalence; nor are hospital visits across the border taken into account.

Approximately 9.2 percent of San Diego residents are veterans compared to 5.5 percent statewide. Similarly, San Diego has a disproportionately high number of residents insured by the Department of Defense (DOD) that are eligible for emergency care at military hospitals and clinics. In fact, one-third of California residents covered by TRICARE, a health care program for active duty and retired service members and their families, live in San Diego (including 60,000 children). Many of these individuals are eligible for medical care from the Veterans Administration or DOD and thus may not seek emergency treatment from a hospital that reports data to the State of California, to be used in the Proposed CES 3.0 calculations.

In addition, research indicates that San Diego residents travel to Tijuana for medical care. A University of California, Los Angeles study of the California Health Interview Study found that 264,000 California residents traveled to Mexico for medical care in 2001. The same report indicates California residents seeking Mexican medical care are most likely living within 15 miles of the border. Supportive of these findings is the fact that several United States insurance groups offer plans with primary medical services in Tijuana and Mexicali.

Thank you for the opportunity to comment on the Proposed CES 3.0. If you have any questions, please feel free to contact Robyn Wapner, Senior Legislative Analyst, at (619) 699-1994 or via email at robyn.wapner@sandag.org.

Sincerely,



GARY L. GALLEGOS
Executive Director

GGA/RWA/sse