

June 2, 2014

VIA ELECTRONIC MAIL

CalEnviroScreen
c/o John Faust, Chief, Community Assessment & Research Section
Office of Environmental Health Hazard Assessment
1515 Clay Street, Suite 1600
Oakland, CA 94612
CalEnviroScreen@oehha.ca.gov

Re: California Communities Environmental Health Screening Tool: Draft
CalEnviroScreen 2.0

Dear Mr. Faust,

The SB 535 Coalition consists of groups supporting the successful implementation of SB 535 (De León, 2012), which requires CalEPA to identify disadvantaged communities based on geographic, socioeconomic, public health and environmental hazard criteria. The law also requires the state to invest revenues from the Global Warming Solutions Act (AB 32, Nuñez/Pavley, 2006) in and for the benefit of those disadvantaged communities, which suffer the worst impacts of climate change and possess the fewest resources with which to mitigate those impacts.

The SB 535 Coalition welcomes this opportunity to submit comments on the Draft CalEnviroScreen 2.0 (“CalEnviroScreen” or “CES”). We commend CalEPA and OEHHA for developing this highly useful tool; it represents a tremendous step forward in tracking environmental and socio-economic disparities in California and identifying the communities facing disproportionate cumulative impacts. We further commend the agencies for developing CalEnviroScreen through a multi-year, transparent public process that diligently addressed and incorporated public comments received from environmental justice communities. We urge state agencies to use the CES tool not only in implementation of SB 535, but also in various other arenas where it can help to improve environmental health and to relieve some of the burdens of environmental injustice. Particular sections of the tool could be used to address particular problems. For example, the air data could be used to address air pollution and pesticide data to address pesticide contamination.

CalEnviroScreen is a vital resource for directing much-needed Greenhouse Gas Reduction Fund (“GGRF”) investments to the “disadvantaged communities” most in need.¹ Having consistent data statewide to track individual and cumulative impacts is a huge leap forward and **will ensure equity in GGRF investments. We support the use of the CalEnviroScreen for allocating GGRF funds.** In particular, we support the new draft’s use of census tracts, rather than zip codes, because in the vast majority of places they will allow for a more refined picture of the burdens on specific communities. We believe that the incorporation of indicators for drinking water and unemployment improve the accuracy of the screening tool. For drinking water, we agree with the use of Public Health Goals – rather than Maximum Contaminant Levels – to determine the scores, because CES is an environmental health screening tool.

¹ See Health & Saf. Code § 39711; DRAFT CalEnviroScreen 2.0 at ii (“CalEnviroScreen will inform Cal/EPA’s identification of disadvantaged communities pursuant to Senate Bill 535.”).

As OEHHA moves to further refine the CES, we hope that you will consider modifications that could improve its usefulness.

1. Health Impacts

Although the CES does not currently measure health risks, we would like to see this capacity developed for later versions. As a preliminary way to address health risk, CES scores could also be expressed as absolutes, such as how far over a burden threshold. This method could re-focus attention on the amount of burden as opposed to merely a percentile rank.

2. Regional Rankings

Consider incorporating or at least publishing regional ranking maps. Use regional planning areas and air basins to determine regions. The regional ranking would allow census tracts in a region to compare against other census tracts in that region, instead of across the state. Regional rankings would help guide investments that may flow through regional or sub-regional agencies.

3. Comparisons to Other Methods

We urge OEHHA to compare CES to other relevant work being done in this field, such as the Environmental Justice Screening Model, the UC Davis Cumulative Environmental Vulnerabilities Assessment (“CEVA”), and the UC Davis Regional Opportunities Index to evaluate the statistical robustness of your model.

Again, we thank you for your thorough science-based approach to this important work, and we look forward to the rapid finalization and utilization of the CalEnviroScreen.

Respectfully,

Bill Magavern, Policy Director
Coalition for Clean Air

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