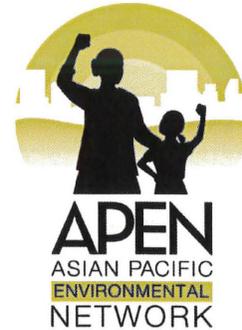




Allen Temple Baptist Church
Founded in 1919



CALIFORNIA BLACK
CHAMBER OF COMMERCE
"Dedicated to Economic Development"



January 28, 2013

John B. Faust, Ph.D., Chief
Community Assessment and Research Section
Office of Environmental Health Hazard Assessment
151 Clay St., Suite 1600
Oakland, CA 94612

Re: Comments on the Second Public Review Draft of the California Communities Environmental Health Screening Tool (CalEnviroScreen)

Dear Dr. Faust:

On behalf of the co-sponsors and supporters of SB 535 (de León, 2012), including The Greenlining Institute, Allen Temple Baptist Church, Asian Pacific Environmental Network, Rising Sun Energy Center, Public Advocates, Coalition for Clean Air, California Black Chamber of Commerce, Brightline Defense Project, TransForm, Natural Resources Defense Council, and Green Technical Education and Employment, we submit the following comments on the second public review draft of CalEnviroScreen. We appreciate the opportunity to share our perspectives on the tool and thank you for your efforts to develop this important resource. It is of critical importance to identify disadvantaged communities facing multiple pollution burdens so programs and funding can be targeted appropriately toward raising the economic and environmental status of the most affected communities. Developing a science-based tool ensures the fair treatment of all Californians, including diverse and low-income populations. As such, we support this initial version of CalEnviroScreen.

A Prime Example of Responsive Government

As organizations dedicated and wanting to ensure that grassroots leaders are participating in major policy decisions, we commend OEHHA's effort to engage the very communities this tool will impact the most. We appreciate your efforts to solicit input on previous drafts through a series of regional and stakeholder-specific public workshops. This version of the tool reflects that this input was given the serious consideration it merited. The current draft includes the use of factors such as linguistic isolation and exposure to diesel emissions. We support these additions as they are important indicators of social vulnerability and exposure.

It is Critical that Socioeconomic Factors Remain Central Elements of the Tool

To truly understand cumulative impacts and to identify the places and people especially vulnerable to the impacts of climate change, it is vital to include socioeconomic factors. As such, we support the continued use of crucial factors such as race and ethnicity, income, educational attainment as well as the weight they are afforded.

We Envision That the Tool Will Have Many Uses and Look Forward to Remaining Engaged

At this time, we are only scratching the surface of the variety of CalEnviroScreen's useful applications. As such we believe it premature to limit the potential uses of the CalEnviroScreen tool. At a minimum, we agree that the tool should closely inform the implementation of Senate Bill 535 (De León, Chapter 830, Statutes of 2012), which requires the CalEPA to identify disadvantaged communities in California for purposes of allocating revenue to those communities from the Greenhouse Gas Reduction Fund. Decisions about how the tool is applied in these revenue allocation decisions, including the thresholds selected (e.g., top 10%, top 20%), are also of critical importance. We look forward to remaining engaged and giving input as the public process around these decisions moves forward.

We expect that the tool will also prove a valuable resource to local and regional decision-makers tasked with realizing the most impact at a time of limited resources. Having access to such a science based tool

for resource allocation will enable our cities, counties, and regional bodies to maximize the co-benefits that accompany investments in improving environmental health. The direct impact of local government in people's lives cannot be understated. Building communities that are resilient to the impacts of climate change depends on informed decision-making.

This Tool Provides an Opportunity to Identify Priority Green Investment Zones

Some allege that by identifying California's most vulnerable and impacted communities, we risk providing a basis for even further disinvestment. We reject this notion. Instead of redlining, we see this tool as a great opportunity to enable the "Greenlining" of these communities. Certainly, its use under SB 535 is a very clear example.

Subsequent Versions Offer Opportunities to Improve the Tool

This version of the tool represents an important first step. We view this as an evolving tool and recommend that subsequent versions seek to improve indicators, use more granular data, and expand public accessibility. Priority improvements should include a time commitment for an analysis at the census tract level as well as regional level analysis.

Transparency and Accountability Should Continue to Be Prioritized

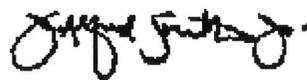
Transparency and public input into government decision-making and policy development are indeed the cornerstones of environmental justice. As such we thank you for making the underlying data accessible to the public. This is a practice that should be continued and expanded. In future iterations, both decision-makers and the wider public could benefit from an interactive online tool that allows stakeholders to understand how cumulative impacts affect their local constituencies.

Thank you for the opportunity to comment on this draft of the CalEnviroScreen and for the robust public participation opportunities that will undoubtedly strengthen its application. Please consider us partners in this important work.

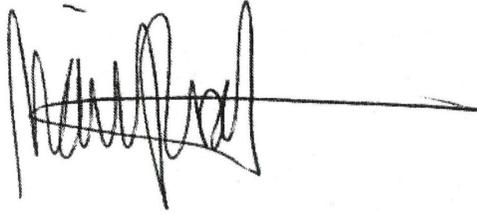
Very truly yours,



Ryan Briscoe Young
Legal Counsel
The Greenlining Institute



J. Alfred Smith, Jr.
Senior Pastor
Allen Temple Baptist Church



Mari Rose Taruc
State Organizing Director
Asian Pacific Environmental Director



Richard Marcantonio
Managing Attorney
Public Advocates



Jodi Pincus
Executive Director
Rising Sun Energy Center

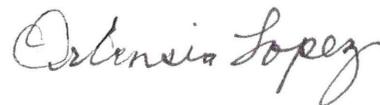


Nidia Bautista
Policy Director
Coalition for Clean Air



Aubry Stone
President and CEO
California Black Chamber of Commerce

Joshua Hardy Stark
State Campaign Director
TransForm



Ortensia Lopez
Executive Director
El Concilio of San Mateo County

Simeon Gant
Green Technical Education and Employment



Victoria Rome
California Legislative Director
Natural Resources Defense Council



Joshua Arce
Executive Director
Brightline Defense Project