



June 2, 2014

CalEnviroScreen 2.0
c/o John Faust, Chief, CARS
Office of Environmental Health Hazard Assessment
1515 Clay Street, Suite 1600
Oakland, CA 94612

RE: CalEnviroScreen 2.0 Comments

Dear Chief Faust,

The San Francisco Public Utilities Commission (SFPUC) supports the development of a screen to identify areas facing multiple pollution burdens and stressors in communities. We appreciate the opportunity to provide our input during the CalEnviroScreen (CES) 2.0 development process.

The SFPUC is a Department of the City and County of San Francisco and is comprised of three essential 24/7 service utilities: Water, Power, and Sewer. We are the third largest public utility in California, working in seven counties with a combined annual operating budget of over \$900 million. We are proud to be the first public utility in the nation to adopt an Environmental Justice Policy and a Community Benefits Policy.

Based on our understanding that CES 2.0 will be used to identify disadvantaged communities for designated funding, the SFPUC has three comments to offer CalEPA as your team works to refine this tool:

1. The current draft CES 2.0 misses communities that face severe pollution impacts, such as Bayview Hunters Point.
2. The methodology of CES 2.0 does not account for cost of living and therefore misses areas located in relatively more expensive regions of the state.
3. The data used in CES 2.0 may be underreported in some severely disadvantaged communities and is therefore an incomplete representation of the environmental burdens and stressors in these areas.

Comment 1: The current draft CES 2.0 misses communities that face severe pollution impacts, such as Bayview Hunters Point.

Our first concern is that there are census tracts within San Francisco that are historically disadvantaged but would not qualify as disadvantaged communities based on the current draft CES 2.0 results. We would like to draw attention to Bayview Hunters Point, an area in the southeast part of the City that has been highly burdened by pollution and other issues of environmental justice. San Francisco's primary wastewater treatment facility, which treats 80% of the city's flows, is located in this area. The City has made significant efforts to address the environmental and socioeconomic issues in the Bayview area. In particular, the SFPUC is investing \$2 billion to rebuild the southeast wastewater treatment facility, and the program includes community benefits in the neighborhood. These dollars could be leveraged by additional state funding designated for disadvantaged communities.

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Commissioner

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Harlan L. Kelly, Jr.
General Manager



CES 1.1 identified zip code 94124, which contains the Bayview neighborhood, in the top 10th percentile statewide with a score of 42.78. Furthermore, other assessment tools, such as the Bay Area Air Quality Management District's Community Air Risk Evaluation, classify Bayview Hunters Point as an impacted community. Yet this community is not in the top 20th percentile of statewide CES 2.0 results, so it would not benefit from state funding programs intended to address disadvantaged communities.

SFPUC Recommendation

CalEPA should conduct a targeted analysis and reassessment of areas that were identified as disadvantaged by CES 1.1 but no longer meet the criteria in CES 2.0.

In addition, CalEPA should have an appeal process for areas that have been considered disadvantaged communities by previous or other screening tools.

Comment 2: The methodology of CalEnviroScreen 2.0 does not account for cost of living and therefore misses areas located in relatively more expensive regions of the state.

As was pointed out recently in an Assembly Budget Subcommittee hearing, CalEnviroScreen 2.0 fails to account for differences in cost of living, and one result is that very few census tracts in the entire Bay Area are identified as disadvantaged. We agree with Assemblymember Nancy Skinner's comment during the hearing that it is a very legitimate concern if little to no areas in our region will be the beneficiaries of state funds for disadvantaged communities, and the tool must be fixed before it is used to allocate funding.

California Environmental Justice Alliance has also pointed out that "in a state as large as California, it is nearly impossible to find a set of indicators that can capture all the issues that our diverse communities face." Consequently, there are areas not identified by the tool that have long been recognized for the environmental burdens they face and the need for government intervention.

SFPUC Recommendation

CalEPA should use a more location-specific gauge for income level, such as the Self-Sufficiency Standard for California, instead of the federal poverty level.

Comment 3: The data used in CalEnviroScreen 2.0 may be underreported in some severely disadvantaged communities and is therefore an incomplete representation of the environmental burdens and stressors in these areas.

Communities of color with lower socioeconomic status frequently face higher burdens of pollution throughout California. Data on these populations are often less available and less accurate because these communities can have higher levels of linguistic isolation and lower levels of educational attainment, both of which are factors that can cause lower rates of reporting. This impacts the data used in CES 2.0 not only in population characteristics but also in pollution burdens, where some of the environmental effects measure distances between polluted sites and populated blocks within census tracts.

CES 2.0 results place census tract 6075980900, which contains the wastewater treatment facility in southeast San Francisco, in the 56-60th percentile statewide for overall score. The pollution burden percentile for this tract is 57, and the population characteristics percentile is 29. The census tract in question shows a population of 350

people and missing values for the socioeconomic factors of educational attainment, linguistic isolation, and poverty. The lack of sufficient, reliable population data affects not only the population characteristics score, but also the pollution burden score. If the population data is inaccurate and unreliable, then the pollution burden indicators that measure distances between environmental effects and populated blocks will also be inaccurate and unreliable. As an example of an outcome that may be the result of this phenomenon, the census tract in question, which contains the wastewater treatment facility and is located immediately next to the San Francisco Bay, has a score of 0 for the environmental effects indicator of impaired water bodies.

Another concern about the data is the level of variance among census tracts that border one another in San Francisco. We find the significant differences in scores, especially for pollution burdens among the census tracts in southeast San Francisco, to be deserving of further analysis, given that these census tracts are located in a relatively dense urban area and are therefore geographically small and close together.

Publicly-owned sewage treatment plants such as the one in southeast San Francisco are considered in the groundwater threats indicator. Census tract 6075980900, where the treatment facility is located, has a groundwater threats percentile of 73, while the census tract immediately bordering it and geographically closest to the treatment facility has a groundwater threats percentile of 11. Another bordering census tract has a groundwater threats percentile of 0. Other environmental effects indicators affecting the pollution burden score have similarly significant variances.

SFPUC Recommendation

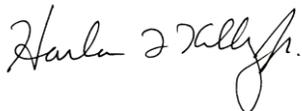
CalEPA should conduct closer analysis and reassessment of the missing or unreliable data and, where appropriate and possible, utilize alternative data sources or gather new data.

Conclusion

We recognize that the classification of disadvantaged communities will likely be based on CalEnviroScreen percentile scores at the discretion of the Secretary. Ultimately, we are very concerned that CalEnviroScreen 2.0 in its current version is an inadequate tool for this purpose, and should not be the only assessment method utilized.

If we can provide you with additional information or answer questions, please do not hesitate to contact Radhika Fox, Director of Policy and Government Affairs, at (415) 554-1830 or rfox@sfwater.org.

Sincerely,



Harlan L. Kelly, Jr.
General Manager, San Francisco Public Utilities Commission

CC: Arsenio Mataka, CalEPA
Assemblymember Phil Ting
Assemblymember Tom Ammiano
Senator Mark Leno