

October 21, 2016

Sent Via Electronic Mail

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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, California 95812-4010

Dear Secretary Rodriquez and Director Zeise:

The Solano Transportation Authority (STA), the Congestion Management Agency (CMA) for Solano County, is writing you to provide comments on the Office of Environmental Health Hazard Assessment's (OEHHA's) draft version 3.0 of CalEnviroScreen (CESv3). CESv3 is a draft, updated version of the statewide screening tool used to identify disadvantaged communities for purposes such as Cap and Trade and Active Transportation Program related grants. CalEnviroScreen (CES) has been adopted for use in prioritizing investments of Cap & Trade auction proceeds as prescribed by Senate Bill 535 (SB 535; De Leon 2012) and subsequent legislation.

STA is supportive of the increased focus by state agencies and funding programs on ensuring that disadvantaged communities are properly identified and funded when transportation dollars are allocated. We further believe that an effective tool for identifying communities of concern will help STA and local agencies in making a number of funding decisions.

Unfortunately, the original version of CES had shortfalls in meeting this need, and CESv3 as proposed would exacerbate those shortfalls.

The current scoring method used in CESv3, in combination with a top 25% cutoff, identifies only a limited set of the various ways that communities can be disadvantaged. With the scoring method it currently employs, CESv3 may identify some types of disadvantage, but overlooks others that are arguably more important, and by requiring too many criteria to be met, it excludes some communities that are deeply disadvantaged in a focused number of categories. This is especially true in urban areas such as the Bay Area, and in the more urban portions of Solano County.

STA therefore joins other Bay Area agencies, such as the Metropolitan Transportation Commission and the Bay Area Air Quality Management District, in requesting CalEPA and OEHHA not implement CESv3 until it has been more fully vetted and modified in order to accurately identify disadvantaged communities in a manner that is consistent statewide, but also accurate in an urban context.

Sincerely,

A handwritten signature in blue ink that reads "Daryl K. Halls". The signature is fluid and cursive, with the first name being the most prominent.

Daryl Halls
STA Executive Director

Cc: STA Board Members
Solano County Board of Supervisors
Steve Heminger, MTC
Jack Broadbent, BAAQMD