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February 1, 2013

Mr. John Faust, Chief
Community Assessment & Research Section
Office of Environmental Health Hazard Assessment
1515 Clay Street, Suite 1600
Oakland, CA 94612

Dear Mr. Faust,

On behalf of the Southern California Regional Rail Authority (“Metrolink”), I appreciate the opportunity to comment on the draft California Communities Health Screening Tool (CalEnviroScreen). We have been closely monitoring the development of this tool as well as Senator De Leon’s legislation, SB 535, on funding of programs that benefit disadvantaged communities. We understand the main use of CalEnviroScreen is as a tool to identify disadvantaged communities and focus state resources and assistance programs on those communities. We support the use of data for sound decision making, however we would like greater clarity in understanding how this new tool will be used with existing programs.

Taking a quick glance at the draft maps developed by the CalEnviroScreen indicates that there are many areas of high risk in Southern California. The illustrative maps present a broad picture, however we are concerned that they may create a false impression regarding the origins of those environmental “problems”. While there is language in the documents released by CalEPA, that might counter this impression, we strongly urge CalEPA to provide a higher level of clarity with the maps. Consequently, Metrolink recommends that the maps contain some explanatory language to clarify that the score represents a large number of environmental, economic, social and health factors and is not a CEQA analysis. Metrolink believes adding this language to the mapping documents themselves will make sure they are not misinterpreted or misrepresented.

Metrolink believes that the CalEnviroScreen provides information to support funding of Metrolink projects and activities under SB 535 and other state laws. Improvements to the region’s transit systems, in particular commuter rail, can provide both localized and regional benefits. We have been working closely with communities around our maintenance facilities to identify ways to reduce our environmental footprint. We hope that the development of the CalEnviroScreen and the implementation of SB 535 results in increased resources dedicated to making these improvements.

As the region's provider of commuter rail, we recognize the important role that our services play in removing cars from the road, which reduces GHG production and air pollution. We also recognize that opportunities are emerging for the implementation of cleaner, greener railroad equipment and the removal of even more cars from our congested roadways. With these facts in mind, we hope to work with CalEPA and identify ways that we can work together to make greater strides in cleaning up Southern California's air.

We appreciate your work to incorporate input from Southern California. Metrolink looks forward to collaborating with CalEPA. If you have any questions please contact Patricia Torres Bruno, Government and Regulatory Affairs Manager, at (213) 452-0259.

Sincerely,



Michael P. DePallo
Chief Executive Officer