



January 25th, 2012

John B. Faust, Ph.D., Chief
Community Assessment and Research Section
Office of Environmental Health Hazard Assessment
1515 Clay St., Suite 1600
Oakland, CA 94612

Re: Comments on CalEnviroScreen

Dear Dr. Faust:

I am writing on behalf of Ubuntu Green, a non-profit organization that partially operates in the Building Healthy Communities area of Sacramento, to submit the following comments on the current draft of the OEHHA environmental justice screening model. I appreciate the opportunity to comment on the development of this valuable tool.

Ubuntu Green is a 501(c)(3) non-profit organization dedicated to supporting sustainable, equitable development and environmental justice through community engagements and trainings that empower residents to be their own advocates. The Building Healthy Communities (BHC) Program is a project of The California Endowment, where they have selected 14 neglected California areas to invest in for 10 years with the goal of addressing the social determinants of health. A zip code within the Sacramento BHC area is identified by the tool as one of the zip codes in the 10% percent of the highest scoring census zip codes. In addition, at least 3 other areas are identified as 1st or 2nd tier for highest risk in the tool are in the City of Sacramento.

As a part of Ubuntu Green's Environmental Justice Initiative (EJI) we have launched a campaign to address Brownfields and Vacant Spaces (BVS). The BVS campaign resulted from community engagement in the Sacramento region where residents pointed out brownfields and vacant spaces as significant public safety and public health challenges in their neighborhoods.

The campaign seeks to map these areas and provide residents with the resources and training needed to turn these community challenges into community assets. We work with many community partners who are also part of the BHC Coalition, including groups focused on pedestrian safety and public health.

As you know, multiple exposures to pollution and contaminants have potentially negative health effects on those impacted. The CalEnviroScreen tool would aid our coalition's efforts to identify and improve environmental justice communities. While the intended use of the tool is to identify these areas for CalEPA and legislative purposes, as the comments in the January 11th CIPA work group meeting clearly suggest, the tool will have alternative, positive use within the environmental justice community. It is imperative that the tool's development take into account additional uses, such as serving as an advocacy tool for communities, or serving as an identifier of environmental justice communities for the purpose of receiving federal and private grants for planning and remediation. As such, the following comments are directed towards making CalEnviroScreen a *comprehensive* tool that is appropriate for both its intended and *anticipated* uses.



Scale: Census Tracts

Census tract level data is necessary to fully achieve the goals of CalEnviroScreen and to create a tool that is most useful for environmental justice and community advocates. Zip code level data is inappropriate because zip codes vary widely in their size, composition, environmental and demographic characteristics. High-density urban communities within large zip codes may potentially be overlooked if their score is impacted by better conditions outside the high density areas. As a result, these communities may miss out on funding or opportunities for cleanup. To illustrate, a census tract contains about 4,000 inhabitants, whereas 58,225 people live in the 90034 zip code (Los Angeles / Culver City).

User Uploaded Neighborhood Level Data

The tool would be more useful if community members were able to add anecdotal neighborhood data to the maps that could be retrieved and employed by agencies and advocates. For example, within the BHC area, communities have engaged in walk audits and community engagements where particular issues and properties are identified, and their impact on the community assessed by those experiencing the impacts. In the absence of census tract level data, this data and information may help to better inform decision-making and resource allocation within a more finite area than the tool currently allows. If the tool were to be updated to provide census tract data, this data would remain relevant and helpful in identifying specific sites and remediating their negative health effects, as experienced directly by residents.

It is my hope that as you consider further modifications to this tool, the CalEPA will make every effort to provide data down to the census tract level, and make this tool interactive and able to receive and share information collected by the residents in the effected communities.

Thank you for your efforts and consideration of these recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles L. Mason, Jr.", written in a cursive style.

Charles L. Mason, Jr.

Founder/CEO, Ubuntu Green