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May 13, 2021

Ms. Sofia Mitchell
Office of Environmental Health Hazard Assessment
Division of Scientific Programs
P. O. Box 4010
Sacramento, California 95812-4010

Subject: SCAG Comments on Draft CalEnviroScreen 4.0

Dear Ms. Mitchell:

Thank you for the opportunity to comment on the draft version of CalEnviroScreen 4.0. The Southern California Association of Governments (SCAG) is the metropolitan planning organization (MPO) for one of the largest and most diverse regions in California, representing six counties, 191 cities, and more than 19 million residents. Our region’s greatest asset is its diversity, particularly in its people. Analysis of our regional conditions continues to reinforce that where a person lives significantly influences their life outcomes. SCAG recognizes that for our region to become healthier, more livable, sustainable, and resilient, it needs to improve outcomes for low-income families and communities of color. To this end, we value and have been using CalEnviroScreen as a screening tool that supports more equitable and data-driven decision-making in our regional planning.

SCAG utilizes the CalEnviroScreen tool in many different work areas, such as the Sustainable Communities Program and environmental justice efforts. SCAG staff appreciates the opportunity to provide input on the proposed updates to the tool. SCAG staff has reviewed the draft report and supporting documentation on updates to the tool and has comments regarding the absence of racial/ethnic and climate change indicators and recommendations regarding an increased emphasis on air pollution indicators and improved outreach efforts. SCAG’s comments are detailed in the attachment to this letter (SCAG Comments on Draft CalEnviroScreen 4.0).

Should you have any questions regarding the attached comments, please contact Anita Au, Senior Regional Planner, at (213) 236-1874 or au@scag.ca.gov.

Sincerely,

Kome Ajise
Executive Director

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SCAG COMMENTS ON DRAFT CALENVIROSCREEN 4.0

EXPLICITLY ADDRESS RACIAL INEQUITY

On July 2, 2020, SCAG's Regional Council adopted [Resolution 20-623-2](#), declaring systemic racism a human rights and public health crisis. The resolution affirms SCAG's commitment to work in partnership with others to close the gap of racial injustice and meaningfully advance inclusion, diversity, equity, and awareness.

SCAG staff commends OEHHA's efforts to evaluate the relationship between race/ethnicity and the draft CalEnviroScreen 4.0 results in the *Preliminary Analysis of Race/Ethnicity and Draft CalEnviroScreen 4.0 Scores* (Preliminary Analysis). SCAG staff urges OEHHA to explore more options to incorporate race/ethnicity into the CalEnviroScreen tool. Explicitly incorporating a race/ethnicity lens allows us to examine the root causes and mechanisms of patterns of inequity we see today in our society. By intentionally naming race/ethnicity, we call out the relationships between historical oppression and inequities currently being experienced today by communities of color.

SCAG staff recommends OEHHA recognize the limitations of the datasets used to describe race/ethnicity. Whenever possible, OEHHA should further disaggregate race/ethnicity data. Many datasets, including the U.S. Census Bureau's American Community Survey, collapse multiple populations together, resulting in significant differences between categories, and this poses significant challenges for data comparison. This includes the limits of the reporting of the nuances of Hispanic/Latinx (or other ethnicities) in relation to race/ethnicity. For example, the Preliminary Analysis uses the category "Black" to describe the Census category African American (Not Hispanic or Latino). However, this category erases much of the Afro-Latinx (Black Hispanic/Latinx) experience by failing to untangle these intersectional identities.

SCAG staff also recommends a more thorough analysis of the environmental health outcomes of Indigenous communities in California. The Preliminary Analysis relies heavily on measures of the "most prevalent" race/ethnicity in each census tract. Due to the smaller population size, Indigenous communities are largely left out of the racial/ethnic analysis. Since this version of CalEnviroScreen incorporates more information from tribal communities (e.g., water quality), it may be appropriate to have an additional discussion on the changes to scores in Indigenous communities.

Environmental Justice is mentioned as a tenet by which CalEnviroScreen was developed, and OEHHA and CalEPA staff emphasized the importance of public engagement. SCAG staff is engaged in self-reflection on the use of this and other terms appropriated from advocacy groups throughout history and encourage OEHHA and CalEPA to revisit their definition of the term as well.

INCREASE WEIGHTING OF AIR POLLUTION INDICATORS

We appreciate OEHHA's ongoing effort to recognize and incorporate additional significant environmental indicators into the CalEnviroScreen tool. With the addition of the new indicator regarding lead exposure, SCAG staff recognizes the variability in the severity of health impacts of the indicators included in the Exposure component.

Air pollution has contributed to over six million deaths globally in 2019¹ and is one of the largest environmental health risks everyone faces daily. In 2019, the United States faced approximately 60,200 air pollution-related deaths, and from 2014-2016, California witnessed an annual average of 5,400 premature deaths from exposure to PM2.5.² Air pollution mortality rates in California and nationwide are much higher compared to those of other environmental hazards. For example, drinking water-associated outbreaks in 2013-2014³ resulted in 13 deaths, of which none were Californians.⁴ Additionally, between 1999 and 2019, there was a national annual average of six deaths due to accidental poisoning by exposure to pesticides; in California, the yearly average was one death per year during the same 21-year time period.⁵

As the most populous state in the country, Californians suffer greater adverse air pollution impacts. California is home to the only areas classified as extreme nonattainment for the current 2015 8-Hour Ozone National Ambient Air Quality Standard (NAAQS) and four out of the six nonattainment areas per the current 2012 Annual PM-2.5 NAAQS.

The statistics above illustrate that air pollution has much more serious public health impacts. Because of the widespread and much more significant health threat to all California residents, SCAG staff urges OEHHA to enhance the weighted structure for the indicators to emphasize the importance of the air pollution indicators.

We understand that CalEnviroScreen weights the Exposure component twice as much as the Environmental Effects component and agree that the possible pollutant burden from the Exposures component is more than the Environmental Effects component. For the next iteration of CalEnviroScreen, SCAG staff recommends a full reevaluation of the weighting structure of all components so that it is evidence-based and considers the severity of health impacts to prioritize areas with the greatest suffering.

The only exposure indicator with a higher mortality rate than air pollution is lead exposure, which, according to one study, is estimated to kill 412,000 people in the United States every year.⁶ As OEHHA has recognized, the health risks of childhood lead exposure, even with only slightly elevated Blood Lead Levels (BLL), can be severe. In 2018, 1.5 percent of children in California under the age of 6 had elevated BLL.⁷ SCAG staff suggests further investigation into lead exposure as an indicator with particularly severe health impacts and adjusting the weight within the CalEnviroScreen tool to reflect the difference in severity from other exposure indicators.

¹ State of Global Air/2020. Air Pollution's Impact on Health: A Global Snapshot. Accessed from:

<https://www.stateofglobalair.org/sites/default/files/documents/2020-10/soga-global-profile-factsheet.pdf>

² California Air Resources Board. Inhalable Particulate Matter and Health (PM2.5 and PM10). Accessed from:

<https://ww2.arb.ca.gov/resources/inhalable-particulate-matter-and-health>

³ This is the most recent data from the CDC's Surveillance Reports for Drinking Water-associated Disease & Outbreaks.

⁴ Benedict KM, Reses H, Vigar M, et al. Surveillance for Waterborne Disease Outbreaks Associated with Drinking Water — United States, 2013–2014. *MMWR Morb Mortal Wkly Rep* 2017;66:1216–1221. DOI: <http://dx.doi.org/10.15585/mmwr.mm6644a3External>.

⁵ Centers for Disease Control and Prevention, National Center for Health Statistics. Underlying Cause of Death 1999-2019 on CDC WONDER Online Database, released in 2020. Data are from the Multiple Cause of Death Files, 1999-2019, as compiled from data provided by the 57 vital statistics jurisdictions through the Vital Statistics Cooperative Program. Accessed from: <http://wonder.cdc.gov/ucd-icd10.html>

⁶ Lanphear, Bruce P et al. (2018). Low-level lead exposure and mortality in US adults: a population-based cohort study. *The Lancet Public Health*. Volume 3, Issue 4, e177 - e184. Accessed from: [https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667\(18\)30025-2/fulltext](https://www.thelancet.com/journals/lanpub/article/PIIS2468-2667(18)30025-2/fulltext)

⁷ California Department of Public Health. 20018 Blood Lead Level Maps and Data. Accessed from: <https://www.cdph.ca.gov/Programs/CCDPHP/DEOD/CLPPB/Pages/BLLMapsTables.aspx>

ADD CLIMATE CHANGE INDICATORS

Climate change risks and vulnerabilities are an area missing from this and previous versions of CalEnviroScreen. According to California's Fourth Climate Change Assessment, Southern California can expect less predictable precipitation, a higher number of extreme heat health warning days, increased storm frequency and intensity, more wildfires, and rising seas.⁸ These primary climate change impacts are expected to result in secondary effects such as more extreme droughts, new disease vectors, worsened air quality leading to health risks such as respiratory illnesses, and increased landslides and debris flows.

Furthermore, a changing climate presents many potential hazards to Southern California residents now and into the future. Roughly 1.8 million people live in very high fire hazard severity zones, over 300,000 people reside in "100-year" flood hazard areas, more than 350,000 residents live in areas estimated to be impacted by three feet of sea-level rise. Additionally, over 6 million people live in areas subject to more than 30 days annually with extreme heat health events.

SCAG staff recommends OEHHA include climate change-related indicators like extreme heat days and tree canopy cover to the CalEnviroScreen tool to address growing concerns on climate change and its direct impact on public health. Some examples of available datasets include [CalAdapt's website](#), where historical observations and climate projections for several climate variables, including extreme heat days, are collected, and the U.S. Forest Service Geospatial Technology and Applications Center's tree canopy cover dataset, which is available on their [website](#). Additionally, OEHHA could include more traditional climate change indicators like proximity to wildfire hazard areas or flood hazard areas. Data for wildfire hazard areas is readily available from the California Public Utilities Commission, and data for flood hazard areas is available from the Federal Emergency Management Agency. SCAG has done robust research and analysis on climate change impacts and can serve as a resource should OEHHA decide to include new climate change indicators in the updated tool.

STRENGTHEN OUTREACH EFFORTS

SCAG staff appreciates the two-week extension of the public comment period. Given the significant application of the CalEnviroScreen tool, more outreach efforts are needed. We request that OEHHA provide a more robust explanation of the CalEnviroScreen development process, including how public feedback received on the previous version was considered and incorporated into the new version. The process by which OEHHA developed Draft CalEnviroScreen 4.0 is not obvious from the materials provided on the website or in webinars. SCAG staff participated in two public workshops (one statewide and one regional) hosted by OEHHA in April and watched the recorded webinar from March 16, 2021. In addition, SCAG staff reviewed public comments from CalEnviroScreen 3.0⁹ and found that many major comments are still applicable to this updated version. SCAG staff recommends OEHHA include its community outreach and public engagement approaches and processes as part of its supporting documentation for public review.

⁸ Bedsworth, Louise, Dan Cayan, Guido Franco, Leah Fisher, Sonya Ziaya. (California Governor's Office of Planning and Research, Scripps Institution of Oceanography, California Energy Commission, California Public Utilities Commission). 2018. Statewide Summary Report. California's Fourth Climate Change Assessment. Publication number: SUMCCA4-2018-013.

⁹ Responses to Major Comments on the CalEnviroScreen 3.0 Public Review Draft. Accessed from: <https://oehha.ca.gov/media/downloads/calenviroscreen/comment/ces3responsetocomments.pdf>

As one of the largest MPOs in the nation and representing over half of the state's population, SCAG staff encourages OEHHA to consider conducting more outreach within the SCAG region. Part of SCAG's mission is to promote innovative planning through information sharing and promoting best practices. SCAG can serve as a resource and provide valuable insight on environmental justice, climate change, and an array of other topic areas that can help further enhance the CalEnviroScreen tool now and in the future.