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Office of Environmental Health Hazard Assessment
 Attn: Draft CalEnviroScreen 4.0
 1001 I Street,
 Sacramento, CA 95814

Subject: SANDAG Comments on the Draft CalEnviroScreen 4.0

On behalf of the San Diego Association of Governments (SANDAG), thank you for the opportunity to comment on the Draft CalEnviroScreen 4.0 screening tool.

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 and
 County of San Diego

SANDAG is currently undergoing a process to develop a bold new transportation vision through our Regional Transportation Plan process. A key component of the vision is to eliminate disparities and ensure that safe, healthy, accessible, and inclusive opportunities are available to everyone — with a specific focus on increasing mobility options for our most underserved communities. Similar to state funding programs, SANDAG will continue to rely on tools, like CalEnviroScreen, to help identify where the region's most disadvantaged populations live, work, and utilize services throughout the region in order to prioritize investment within these communities. As such, it is imperative that the CalEnviroScreen methodology consider all relevant factors to capture the unique nature of this region and provide an accurate representation of the communities that we serve.

With this in mind, SANDAG encourages the Office of Environmental Health Hazard Assessment (OEHHA) to consider the following as CalEnviroScreen 4.0 is finalized:

Military and Border Region Considerations

CalEnviroScreen 3.0 made several improvements to help provide a more accurate representation of San Diego's communities along the border. However, it left out significant populations that are particularly relevant to the San Diego region. Unfortunately, these data gaps are carried forward in the Draft CalEnviroScreen 4.0.

In particular, data from the Veteran's Affairs (VA) and military hospitals/clinics are not included in the calculation of asthma and heart attack prevalence; nor are hospital visits across the border taken into account, either from those who live in Mexico and access health care in the United States or those who live in the U.S. and access health care in Mexico.

Updated Streets and Roads Data

SANDAG appreciates the consideration of community impacts related to traffic at the land Ports of Entry as well as major roadways adjacent to the border on the Mexican side. It appears that the Draft CalEnviroScreen 4.0 continues to use 2008 traffic data that was previously obtained by SANDAG via Tijuana's Municipal Planning Institute (IMPLAN Tijuana) to provide a snapshot of the traffic impacts on major roadways that fall within the 150-meter buffer of border census tracts in that year. In the absence of more current data, SANDAG encourages OEHHA to consider methods for reflecting likely growth in traffic on Mexican roadways and would be happy to help identify ways to do this. One option could be to scale up traffic data in proportion to the growth in border crossings as reflected in data obtained through the U.S. Bureau of Transportation Statistics (BTS).

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Pollution Burden Data

Consistent with Assembly Bill 1059 (Garcia, 2015), SANDAG encourages OEHHA to incorporate new data related to air quality measurements for ozone and particulate matter in the border region and vehicle emissions at border crossings. SANDAG, the Imperial County Transportation Commission, and Caltrans recently completed the [Impacts of Border Delays at California-Baja California Land Ports of Entry](#)¹ study, which provides estimates for average daily emissions of CO₂, ROG, NOX, PM10, and PM2.5 as a result of border delay at all ports of entry along the California-Baja California border for personal vehicle and commercial truck trips. The analysis used 2016 as a base year and quantified average daily emissions using tools employed by CalEnviroScreen, including observed border crossing volumes (from BTS) and emissions rates from EMFAC 2017. SANDAG would appreciate any opportunity to discuss the study and support OEHHA in this regard.

Thank you for your consideration of these comments. SANDAG looks forward to continuing to refine this screening tool to ensure that the most underserved communities are appropriately represented. If you have any questions, please reach out to Robyn Wapner, Manager of Government Relations, at rwap@sandag.org.

Sincerely,



HASAN IKHRATA
Executive Director

HKI/LGA

¹ SANDAG, "Impact of Border Delays at California-Baja California Land Ports of Entry."
<https://www.sandag.org/index.asp?classid=19&projectid=535&fuseaction=projects.detail>