



[Office of Environmental Health Hazard Assessment \(OEHHA\)](#)

P.O. Box 4010
Sacramento, CA 95812-4010

May 14, 2021

RE: Comments and Recommendations on the Draft CalEnviroScreen 4.0

Dear Office of Environmental Health Hazard Assessment:

The California Environmental Justice Alliance (CEJA) is pleased to submit the following comments on the draft CalEnviroScreen 4.0. As a statewide, community-led alliance that unites over 20,000 residents from frontline environmental justice (EJ) communities across California, we appreciate OEHHA and CalEPA's work to produce a robust cumulative impacts screening tool that can identify some of our state's most overburdened communities. We would also like to thank the OEHHA and CalEPA staff for meeting with CEJA members to discuss our questions and recommendations, and for hosting additional workshops so that more residents can learn about and comment on the draft tool.

CEJA strongly supports the use of CalEnviroScreen in both state and local policy-making to develop stronger safeguards and target critical resources in our state's most vulnerable communities. While CalEnviroScreen is widely recognized as a tool for allocating climate investments, it is important to highlight that it is an incredibly versatile tool that can be included in a much broader array of environmental policy applications. CEJA organizations have long advocated for the creation and increased use of CalEnviroScreen in decisions related to land use planning, permitting, clean up, enforcement, and other environmental issues. It is critical that policymakers, agencies, planners, community-based organizations, and residents fully understand the important ways in which CalEnviroScreen can be used to provide greater protections and resources for vulnerable EJ communities across California.

To strengthen CalEnviroScreen's ability to measure cumulative community burdens, CEJA would like to present the following recommendations on the draft 4.0 tool:

Strategies and Resources to Increase Local and Regional Use of CalEnviroScreen

While CalEnviroScreen has been developed as a statewide ranking tool, its data analysis and indicators are being increasingly used at the local and regional levels. In order to create robust and consistent ways for local application of CalEnviroScreen, we recommend that OEHHA and CalEPA develop the following community engagement strategies, educational materials, and tools for the public:

- *Provide an Analysis of the Indicators that are Driving Cumulative Census Tract Scores.* CEJA recommends adding a feature in CES 4.0 to help users better understand what individual indicators are driving or influencing cumulative scores for census tracts. This type of data analysis could help local communities with analyzing community impacts and changes over time so that they may be able to highlight certain priority issues that should be addressed through new solutions and interventions. For example, the Houston–Galveston–Brazoria (HGB) EnviroScreen carried out a sensitivity analysis to identify factors driving tract scores. Visualization of this sensitivity analysis allowed exploration of which domains and indicators drive vulnerability in a given census tract and provided an important mechanism for communication with community groups.¹
- *Outreach and Education.* We deeply appreciate OEHHA's outreach to EJ organizations across the state to participate in the draft CES 4.0 update. Continuing with this effort, we recommend that CalEPA and OEHHA further develop a robust outreach and capacity-building program for local jurisdictions, metropolitan planning agencies, and community based organizations so that both decision-makers and the public can gain a better understanding of what CalEnviroScreen measures and the best uses of the tool. These trainings should include extensive and multimedia education, especially with community partners, to show the importance of CalEnviroScreen's pollution prevention and intervention uses beyond its application for allocating investments. Community-based organizations such as those within the CEJA alliance look forward to our continued partnership with agency staff to help support more accessible regional education and training on the importance of CalEnviroScreen.
- *Regional Rankings.* While CalEnviroScreen was established as a statewide ranking tool, CEJA continues to recommend that CalEPA and OEHHA create and publish regional rankings to help local governments and community members analyze data from a local or regional perspective. This includes the development of a clear and concise methodology for regional rankings and publishing an official dataset on OEHHA's website. Regional rankings could also increase CalEnviroScreen popularity and usage and could increase the tool's inclusion in local programs and policymaking. Regional

¹ Bhandari, S., Lewis, P., Craft, E., Marvel, S. W., Reif, D. M., & Chiu, W. A. (2020). [HGBEnviroScreen: enabling community action through data integration in the Houston–Galveston–Brazoria region](#). *International journal of environmental research and public health*, 17(4), 1130. Chicago

Rankings are especially important for EJ communities that do not show up well within a statewide ranking system, but would be identified as disadvantaged regionally. As an alternative, we would also recommend that OEHHA produce and publish guidelines containing recommendations on how to implement the tool at the local and regional levels.

New CES 4.0 Indicator: Children's Lead Risk from Housing

CEJA applauds the inclusion of the 'children's lead risk from housing' indicator in the draft CalEnviroScreen 4.0. This is especially important as community-based organizations such as the Asian Pacific Environmental Network (APEN) continue to implement critical policies and legislation such as AB 1232 (Gloria, 2020): The Healthy Homes Act that streamlines the delivery of energy upgrades and home health remediation strategies in disadvantaged communities. Many of APEN's members are concerned about being exposed to toxic building materials and the severe health risks that often come with living in older housing. As our state works to advance a just recovery from the ongoing COVID-19 pandemic, it is vital that residents' homes are healthy, clean, safe, and structurally resilient.

CEJA would also like to suggest the following ways to improve the children's risk exposure from housing indicator:

- *Lead in Water vs. Lead in Paint.* Include language within the the CalEnviroScreen 4.0 report and other educational materials that clarifies that lead in paint and house dust is the #1 source of lead poisoning for children under the age of six. We hope that this clarification can avoid possible confusion when it comes to how cities and communities decide to prioritize their resources. While we continue to work on eliminating lead in water exposure, it should become evident that the number one source is lead based paint and dust in homes due to the dilapidated housing conditions, a huge issue in environmental justice communities. It would also be beneficial to have both maps, lead in drinking water and lead in housing, overlapped in order to increase communities' awareness of lead exposure.
- *Additional housing quality and safety issues:* In addition to analyzing children's exposure to lead by analyzing the age of housing stock, CEJA recommends exploring other housing quality and safety issues that could be added to this indicator that can impact children's health, such as natural gas pollutant exposure, housing habitability (e.g., lack of basic amenities such as plumbing and having a kitchen), housing overcrowding (occupants per room), and the percent of households in mobile homes. Alternatively, these data could also be included as a separate indicator on housing quality.
- *Ranking housing:* During the CES 4.0 workshop for the San Diego region, the Environmental Health Coalition (EHC) learned that EJ communities such as Barrio Logan are not ranked highly due to new affordable housing units that have been built in recent years. We would like to request that OEHHA identify alternative methods for calculating housing stock age so that this does not occur.

- Analysis of income. During a draft 4.0 workshop, EHC learned that the tool uses HUD's 80% AMI. The City of San Diego uses HUD's Low and Moderate Income (LMI). We would like to request that OEHHA conduct a comparative analysis using both measurements to help jurisdictions that also use the LMI to better understand which one is more useful for the areas that need it the most.

Additional Indicators and Supplemental Data for CES 4.0

CEJA recommends adding the following new indicators and supplemental data to CalEnviroScreen 4.0:

- Legacy impacts (Redlining and COVID-19 data). We recommend that OEHHA include a supplemental analysis for each individual census tract (similar to the race and age analyses) that can illustrate the impact of historic and current forms of discrimination against specific neighborhoods and communities. For instance, while the data may be challenging to obtain, legacies of racial discrimination could be shown by noting which census tracts were once historically redlined areas according to Home Owners' Loan Corporation (HOLC) maps and other similar discriminatory programs. Census tracts could also include an analysis of COVID-19 positive infection rates, hospitalization rates, and/or death rates that have severely impacted the physical health and well-being of local communities. Such data also has implications for people's mental and spiritual health, their access to COVID-related recovery resources and medical care, and their access to good jobs and economic opportunities.
- Add a new indicator on medically underserved areas: OEHHA should consider including lack of access to health care facilities as an indicator based on Medically Underserved Area (MUA) and Health Professional Shortage Area (HPSA) score data, including the ratio of health providers to resident in census tracts, or weighting health indicators based on access to the kinds of healthcare facilities used to measure the data.

Housing Burdened Low-Income Households: Clarifying Utility Data

Although the draft CES 4.0 report states that utilities are considered as a component of Housing Burden, it does not specify which utilities are included in this indicator. We agree that including both wet (water and wastewater) and dry utilities (electricity, natural gas, internet, and telephone services) is essential to determining housing burden. We request that OEHHA confirm which utilities are included in this indicator and whether it reflects the cost of water and wastewater service for households reliant on domestic wells and/or septic systems, as many households in urban fringe and rural areas are. These costs may include but are not limited to: the cost of bottled water where well water fails to meet safe drinking water standards, costs associated with drilling deeper wells necessitated as a result of groundwater depletion, and costs of periodic septic tank pumping and replacement.

Pesticides: Additional Data

CEJA appreciates the recent improvements to the pesticides indicator to include additional pesticide chemicals. These improvements have been observed by some of CEJA's member and partner organizations, including CAUSE (Central Coast Alliance United for a Sustainable Economy) that reports that pesticide hot spots within the Central Coast region light up appropriately on the draft CES 4.0 map.

To further strengthen this indicator, one CEJA's partner organizations, Leadership Counsel for Justice and Accountability, recommends the inclusion of additional pesticides in CES 4.0 such as fumigants that are likely to be involved in health-harming pesticide drift incidents. Leadership Counsel is also concerned about the exclusion of two pesticides, in particular glyphosate and paraquat. Due to their incredibly lethal impacts in small amounts, we suggest that OEHHA add these two additional chemicals to the pesticide indicator for CES 4.0. Leadership Counsel also recommends that OEHHA include data about pesticide exposure at schools and other sensitive sites in future iterations of this indicator in CalEnviroScreen

Drinking Water: Inclusion of Additional State Data

Water: Similar to pesticides, many communities in the heavy agricultural regions of the San Joaquin & Eastern Coachella valleys are disproportionately burdened by contaminated water and/or lack of access to water in general. While we appreciate the inclusion of new data from a variety of sources, some questions still remain. First, upon review of the Drinking Water Contaminants section, it was unclear how/why the subset of contaminants used for metric calculations were selected. We recommend that all primary drinking water contaminants for which the state has data be included in this metric, where possible. Additionally, for groundwater levels, data should include information from all monitoring wells used by Groundwater Sustainability Agencies (GSAs). Since groundwater threats can also come from the lowering of groundwater levels (as in the case of nitrates), we recommend OEHHA include California Statewide Groundwater Elevation Monitoring (CASGEM) data as well.

Diesel Indicator: Additions to Indicator Map and Concern Regarding Methodology

Similar to how other individual air quality-related indicator maps show pinpointed sources of pollution, we recommend that the Diesel PM indicator map show the locations of sources from the four sectors included: area, point, on road mobile, and ocean going vessels. We recommend that this map layer also show locations of indirect sources that attract heavy duty trucks, including distribution centers, warehouses, and logistics facilities. Finally, we recommend that the Diesel PM layer display an overlay of [truck routes](#) in the state, including frequently used routes between the designated truck routes and local indirect sources attracting a considerable amount of diesel truck traffic.

Unfortunately, a number of CEJA organizations have reported that the new calculation for the Diesel PM indicator in the draft 4.0 makes it difficult to demonstrate concentrated pollution burden in certain EJ communities. For instance, along the Central Coast, Diesel PM burden is now spread out amongst various census tracts in the draft CES 4.0 compared to CES 3.0 where Diesel PM burden was more clustered. CAUSE has noted that the CES 3.0 methodology for analyzing Diesel PM clearly demonstrated hotspots along a truck route from the nearby Port of Hueneme, which is important data that the organization uses to advance their clean trucks advocacy. In addition, EHC has raised concerns about the Diesel PM percentiles for the San Diego area and recommends making the indicator's raw data publicly accessible, with an added explanation for why the new data are substantially different from the 3.0 version.

Hazardous Waste Facilities: Improvements to Indicator and Maps

- Settlement data in maps. EHC recommends the inclusion of recent settlement data to enhance communities' understanding of local hazardous waste impacts and ability to identify solutions. For instance, ten California jurisdictions are part of a landmark settlement between Sherwin-Williams, ConAgra Grocery Products Co. and NL Industries, including the City of San Diego. The lead paint manufacturers agreed to a \$305 million settlement, according to a filing in Santa Clara County Superior Court in California in July 2019. In order to assist these communities in distributing these funds, we recommend that OEHHA create a special tab under this indicator for the 10 jurisdictions.
- Hazard proximity to ports, railyards and airports. CEJA recommends that OEHHA include a measurement on hazard proximity that was developed through the Environmental Justice Screening Method (EJSM), which measures proximity to ports, rail yards, and airports that expose residents to high levels of noise, vibrations, and a higher risk of explosive incidents. Living near airports, ports and rail yards has also prompted residents to voice concerns over high noise levels at all hours of the day, exposure to large amounts of dust and other harmful particles, various public health problems related to incompatible land use and zoning, and a lack of beneficial investments coming into the surrounding neighborhoods.
- Small sources of hazardous waste and pollution. We recommend including pollution data from the California Air Resources Board's (ARB's) "Facilities of Interest" database to capture pollution from light industrial or other business sources such as paint and autobody shops that emit volatile organic compounds (VOCs) and leak chemicals and waste onto roads, sidewalks and storm drains, etc.

Ozone and PM 2.5 - Enhancements to Individual Indicator Maps

We recommend that the Ozone and PM 2.5 individual indicator maps visually display which census tracts did not have an air monitor within 50 kilometers of them and therefore relied on data from a neighboring census tract data. This should be visually displayed for other indicator maps where neighboring census tract data is used in the methodology too, as it will help inform

agencies and advocates about where greater and more accurate monitoring and data collection are needed in the state.

Thank you for considering our comments on the draft CalEnviroScreen 4.0. Please feel free to reach out to CEJA at any time to discuss these recommendations further. Many thanks once again to CalEPA and the OEHHA staff for their outreach to our alliance and for sharing their invaluable insight with us.

Sincerely,

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