

May 14, 2021

Director Lauren Zeise  
Office of Environmental Health Hazard Assessment  
1001 I Street  
Sacramento, CA 95814

**Re: *City of San Diego Comments on Draft CalEnviroScreen 4.0***

Dear Director Zeise:

The City of San Diego (City) appreciates and supports the efforts of California's Office of Environmental Health Hazard Assessment (OEHHA) to update the important CalEnviroScreen tool. Advocates have long pushed for a tool like CalEnviroScreen to assess the environmental impacts of pollution on our vulnerable populations. CalEnviroScreen 4.0 (CES 4.0) continues to provide important updated information on the environmental health hazards predominantly faced by our communities of concern.

We support the improved methodology to capture data from the U.S.-Mexico border and the added indicator on lead exposure. However, it is evident in the results of CalEnviroScreen that much more can be done to develop a fuller understanding of the environmental justice issues facing our border region, and specifically the community of San Ysidro, to make sure they are prioritized for investments to mitigate their exposure to environmental pollutants and the harmful effects of climate change. A closer look at CES 4.0 shows us that a San Ysidro census tract (60730100005) ranks in the 52<sup>nd</sup> percentile for pollution burden, while population characteristics rank in the 85<sup>th</sup> percentile. However, if you speak to residents in this community, they can attest to poor air quality and it ranks in the 98<sup>th</sup> and 90<sup>th</sup> percentile for PM 2.5 and Diesel PM exposure, as well as 78<sup>th</sup> percentile for asthma rates in CES 4.0. This clearly shows that our border region is suffering from the effects of pollution, yet it does not rank high enough to be considered a Disadvantaged Community (DAC) per Senate Bill (SB) 535.

In the City of San Diego, we have dedicated our efforts to better understand climate equity and reimagine how our city can advance our climate equity goals, empower our communities of concern, and build a more sustainable future for all San Diegans. In 2019, the City established the Equity Stakeholder Working Group, comprised of over 30 community-based organizations and local nonprofits in communities of concern to advise the Sustainability Department on equitable best practices in implementing our Climate Action Plan and advancing climate equity in the City. In listening to our community leaders, we have come to understand that CalEnviroScreen is a useful tool; however, some stakeholders identified a shortcoming in identifying communities suffering from the impacts specifically related to climate change. This assessed gap in CalEnviroScreen prompted the City to develop the first-of-its-kind Climate Equity Index (CEI).

The CEI utilizes all the indicators within CalEnviroScreen 3.0 and adds 21 additional indicators to account for the impacts of climate change, such as wildfire risk and flood risk, to better assess the neighborhoods that are impacted most by pollution and those most vulnerable to climate change. You can review the report and latest updates at [www.sandiego.gov/ClimateEquity](http://www.sandiego.gov/ClimateEquity) to learn more. When we compare San Diego's Communities of Concern (tracts with Very Low to Moderate Access to Opportunity) and the State's DAC per SB 535, our communities like City Heights, Southeastern neighborhoods, and our border communities like Nestor, Otay Mesa, and San Ysidro are left out, even though they are predominantly communities of color and low-income households.

The City believes that if we are to holistically address the issues of environmental justice and health equity to ensure our overburdened and underserved communities are prioritized, the State and other jurisdictions must include a measurement of the impacts of climate change on our communities as part of any prioritization tool. The State has consistently used CalEnviroScreen to prioritize climate investments in DACs or what our communities prefer to be called, "Communities of Concern" – yet CalEnviroScreen does not measure climate change impacts. In San Diego, that has greatly limited access to state funding for over 500,000 Californians suffering from poor air quality, lack of quality public transit, and lack of access to healthy food.

The State should seek to better address frontline communities by more fully considering the impacts of climate change along with pollution burden and health effects.

The City respectfully requests that, as the State continues to use CalEnviroScreen to prioritize climate investments, jurisdictions like ours be permitted to use similar and more comprehensive tools like the CEI to target State grant funding in communities of concern. The City also recommends OEHHA begin to include indicators that measure the impacts of climate change so that the State has a more complete understanding of our communities of concern and the resiliency investments necessary to protect them.

We thank you for your time and consideration on this matter. Should you have any questions, please do not hesitate to contact me or Roberto Carlos Torres, Climate Equity Specialist for the City of San Diego, at (619) 533-5974 or at [rctorres@sandiego.gov](mailto:rctorres@sandiego.gov).

Thank you,



Alyssa Muto  
Interim Director • Sustainability