



® October 18, 2016

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CalEnviroScreen
c/o Carolyn Flowers
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Re: Comments on Draft CalEnviroScreen Version 3.0

Dear Ms. Flowers:

The California State Association of Counties (CSAC) appreciates the opportunity to submit comments on the draft update to the California Communities Environmental Health Screening Tool (CalEnviroScreen 3.0), by the California Environmental Protection Agency's Office of Environmental Health Hazard Assessment (OEHHA). CSAC recognizes that CalEnviroScreen is an important tool for identifying communities that face the highest pollution burdens and where socioeconomic characteristics make residents especially vulnerable to these environmental hazards. Accordingly, while CSAC argues that CalEnviroScreen should not be the sole tool for identifying disadvantaged communities, it provides helpful information in identifying communities facing disproportionate pollution burdens and sensitivity. CSAC appreciates the effort undertaken in Version 3.0 to update and refine indicators to ensure the tool is functioning as intended. We offer the following comments on the draft.

CSAC supports the addition of the rent-adjusted income variable, as it standardizes incomes to better reflect differences in the cost of living across the state. This new variable is an important step in the right direction in ensuring accurate comparisons between communities, but there is increasing recognition that a complete measure of housing affordability should incorporate both housing and transportation costs.¹ While residents living in location-efficient housing may tend to face higher rent burdens, these costs may be partially offset by lower transportation costs. On the other hand, residents of areas with both relatively high rent burdens and high transportation costs will have even lower incomes after adjusting for the true costs of housing.

Adjusting income to reflect both transportation and housing costs is especially important to accurately describe socioeconomic conditions in rural and suburban parts of California. These areas may often have lower housing costs than the urban core, but limited options for transit and active transportation may make transportation much more costly. In fact, a recent analysis from the California Department of Housing and Community Development illustrated that total housing and transportation costs as a percentage of income made the true cost of living in some of California's most rural areas even higher than in urban areas where housing affordability challenges often receive greater media attention.

¹"In places with fewer transportation choices, savings on housing costs can be more than offset by increased transportation expenses. While 69 percent of communities are affordable under the conventional definition (housing costs less than 30 percent of income), only 39 percent are affordable using a comprehensive definition (combined housing and transportation costs less than 45 percent of income)." https://www.fhwa.dot.gov/livability/fact_sheets/transandhousing.pdf

Data are available to better refine CalEnviroScreen's income variable to incorporate both transportation and housing costs at the census tract level from the Center for Neighborhood Technology's Housing and Transportation Index tool.² Accordingly, CSAC urges OEHHA to adjust income for transportation costs simultaneously as rent burden is added to the calculation.

Finally, CSAC continues to have concerns with the potential for over-reliance on the CalEnviroScreen as a tool to identify disadvantaged communities for a variety of programs allocating state funding. While this comment is beyond the scope of the draft update, there should be a consideration each time CalEnviroScreen is used for such purposes of whether it provides the best direction. For instance, while it is easy to make an argument for using the tool for programs that aim primarily to mitigate or eliminate environmental hazards in disadvantaged communities, caution should be urged when a funding decision may have the unintended impact of increasing exposure to pollution by vulnerable populations. While state law limits state agencies' discretion in this regard, CSAC urges thoughtful consideration of the appropriateness of using CalEnviroScreen in each instance.

Thank you for your thoughtful consideration of our comments. If you have any questions regarding our recommendations or concerns, please do not hesitate to contact us. Kiana Valentine can be reached at 916-327-7500, ext. 566, or kvalentine@counties.org and Cara Martinson at 916-327-7500, ext. 504, or cmartinson@counties.org.

Sincerely,



Kiana Valentine
Legislative Representative



Cara Martinson
Legislative Representative

²<http://htaindex.cnt.org/map/>