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Subject: Proposed Changes in CalEnviroScreen 3.0 Update

The Climate Change Policy Coalition is a coalition of business and taxpayer groups working for effective implementation of AB 32. Our goal, has been, and continues to be to serve as a constructive voice in the implementation of AB 32 to ensure that greenhouse gas emission reductions required by the statute are achieved while maintaining the competitiveness of California businesses and protecting the interests of consumers and workers.

As California's climate change policies evolve, environmental justice priorities appear to be weighted with more significance than jobs and the economy for all Californians. Regulatory policies are being put into place with a broad scope of criteria therefore expanding CCPC's role beyond AB 32 implementaton. California's business community takes very seriously the need to assure all Californians are assured balanced climate change regulations are adopted. That desired outcome is balanced among clean air and water along with jobs for our residents, a solid tax base for our communities, affordable housing and food for our consumers, and a California where our children can plan their futures.

CCPC's comments today focus on the Office of Environmental Health Hazard Assessment's [OEHHA] CalEnviroScreen 3.0 mapping tool. While we understand this CalEnviroScreen 3.0 tool is being used to identify California communities that are most affected by many sources of pollution and where Californians may be vulnerable to the affects of the indicators used in the mapping tool; we have some concerns that we believe need to be addressed as OEHHA moves forward in refining the final mapping tool. Many of these concerns mirror concerns previously expressed by a comprehensive coalition with regard to all versions of the CalEnviroScreen and the original legislative language.

Weighting and Scoring Methods of the Indicators: Although the tool includes revisions to several of the weighting and scoring methods of the indicators, and includes the addition of two new indicators composed of emergency department visits for acute myocardial infarction and incorporating housing costs into the socioeconomic factors, we continue to believe the methodology and assumptions used to evaluate cumulative impact to communities remain inappropriate and continue to cloud the distinction between health outcomes driven by socioeconomic status and those caused by chemical pollution exposure.

Use of CalEnviroScreen 3.0 in general: OEHHA must be more specific about how the tool can and cannot be used. CalEnviroScreen 3.0 should not be used for CEQA, permitting, regulatory or land use planning. This tool should not be as a mechanism to assess fines or penalties to local businesses within highly ranked communities.

Biased language within the tool: The guidance document continues to overly emphasize 'exposure' rather than 'potential exposure'. We continue to recommend adding "potential" to all mentions of exposure and pollution burden.

Confusion regarding the impact of pollution versus socio-economic status of communities: The current methodology that multiplies the population characteristics with the potential pollution burden continues to dilute and confuse the impact of pollution versus socio-economic status of communities.

Percentile scores versus actual values: Using percentile scores for indicators, rather than normalized actual values, leads to the perverse outcomes of the tool, and warps the relative importance of certain indicators.

Potential triple counting of certain indicators: This triple counting is further exacerbated by the multiplicative methodology described above, for example, particulate matter and diesel particulate matter are also included by the use of PM2.5, traffic counts, and DPM in the indicator data. We also believe that there is double or triple counting in the population socio-economic indicator data—low birth weight, asthma emergency room visits, linguistic isolation, and educational attainment are all directly tied to poverty, yet each is its own factor. This triple counting is further exacerbated by the multiplicative methodology described above.

CCPC and our partner organizations would like to further work with OEHHA to improve the CalEnviroScreen 3.0 mapping tool and guidance document as the process continues prior to final approval. Should you have any questions or need anything further please contact Shelly Sullivan at (916) 858-8686.