COACHELLA VALLEY ASSOCIATION OF GOVERNMENTS
73-710 Fred Waring Dr., Suite 200, Palm Desert, CA 92260 · (760) 346-1127 · www.cvag.org

CVAG

October 21, 2016

Carolyn Flowers
Office of Environmental Health Hazard Assessment
P. O. Box 4010
Sacramento, California 95812-4010

Subject: CalEnviroScreen 3.0

Dear Ms. Flowers:

Thank you for the opportunity to provide comments on the update to California Communities Environmental Health Screening Tool (CalEnviroScreen). As the Executive Director for the Coachella Valley Association of Governments – the regional planning agency that coordinates government services in eastern Riverside County – I appreciate your efforts to improve the way some of the indicators are calculated. However, I wanted to express concerns that, even with these revisions, the CalEnviroScreen does not fully depict the challenges we face in the Coachella Valley and in the City of Blythe.

The Coachella Valley is often associated with areas of affluence. However, both the Coachella Valley and eastern Riverside County are actually economically diverse regions of the state, with several environmental justice areas. We also experience significant truck traffic along State Highway 86 and along Interstate 10, which is a major route for bringing goods from the ports to all points east. Several of our communities demonstrate the disparities that exist here: In the City of Desert Hot Springs, for example, the US Census showed 29.4 percent of families and 33.1 percent of the city's population live below the poverty line, including 45.2 percent of those under age 18 and about 16 percent of seniors who are age 65 or older. The statistics are even more staggering further east in Mecca, an unincorporated agricultural community that is predominately home to Latino farm workers. Just three years ago, the data showed that more than 60 percent of the population live below the poverty line.

The region also faces challenges in terms of achieving health and environmental goals. The Coachella Valley – which is located in the Salton Sea Air Basin and is under the South Coast Air Quality Management District's jurisdiction – has been designated as a serious nonattainment area for PM10. The air quality concerns are expected to be exasperated as the Salton Sea continues to recede, exposing potentially hazardous lake bed. According to the Palm Desert-based Health Assessment Resource Center (HARC), nearly 11 percent of children in the Coachella Valley have been diagnosed with asthma. The same survey showed more than 16 percent of adults in the Coachella Valley have only fair or poor health, with 41.5 percent of them facing chronic illness.

But despite these high rates of poverty and poor health outcomes, the majority of the Coachella Valley and the City of Blythe are receiving unfavorable scores on the CalEnviroScreen 3.0 maps. Communities that are generally considered disadvantaged areas, including the City of Desert Hot Springs and the City of Blythe, have scores that are below 40 percent. With the exception of a segment in the City of Indio, the eastern Coachella Valley is generally rated in the 70 percent

range. The areas that CalEnviroScreen does emphasize in the CVAG jurisdiction are either unpopulated or scarcely populated. CVAG continues to evaluate the various criteria that is involved in this map, but our initial findings show the relatively low scores for urban pollution burden are resulting in a lower CalEnviroScreen score. This is a vast geographic area, and additional data sets would provide a more complete picture and more accurate scores. In order to fully account for the impact that poverty has on the health and well-being of a community, there should also be a greater emphasis on the socio-economic factors and sensitive population indicators, such as health data and asthma rates.

To illustrate the point, CVAG is attaching three maps that demonstrate how differently the Coachella Valley and the City of Blythe are depicted. The first is a snapshot of the region based on CalEnviroScreen 3.0; the others show households earning less than 80 percent of the state's median income and the concentration of schools where 75 percent of students are eligible for free or reduced-priced meals. Being depicted with low CalEnviroScreen scores will ultimately make it difficult for the Coachella Valley and the City of Blythe to compete for many funding sources. If investments are made to gather more comprehensive pollution and air quality data, and if a greater emphasis is placed on the socio-economic factors and sensitive population indicators, then CalEnviroScreen could provide a more accurate picture on the disadvantages this region faces.

Thank you again for the opportunity to provide feedback on CalEnviroScreen. Please do not hesitate to contact my staff if you have questions or need additional information. CVAG governmental projects manager Erica Felci can be reached at (760) 346-1127 or efelci@cvag.org. I appreciate your consideration.

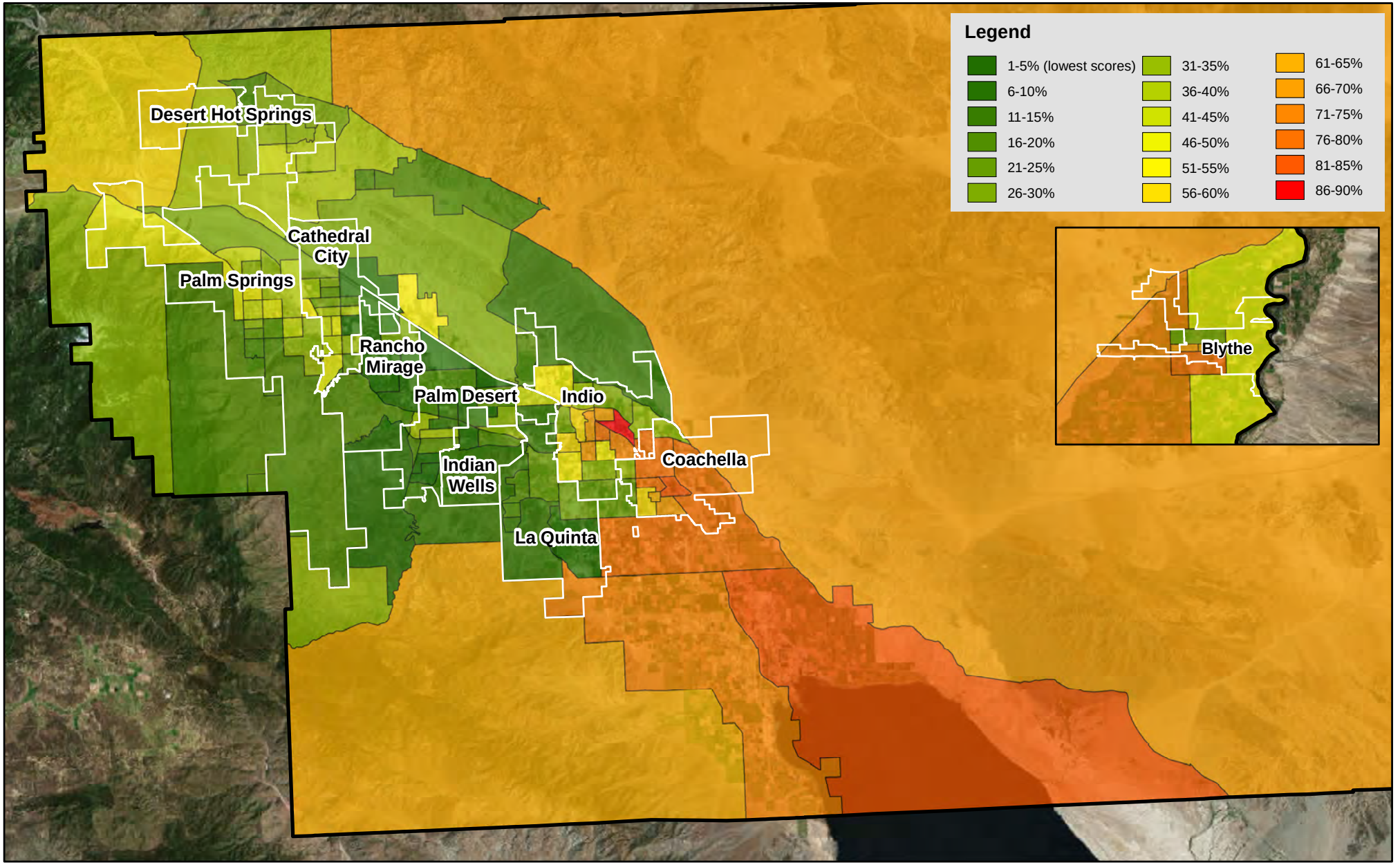
Sincerely,

Tom Kirk
Executive Director

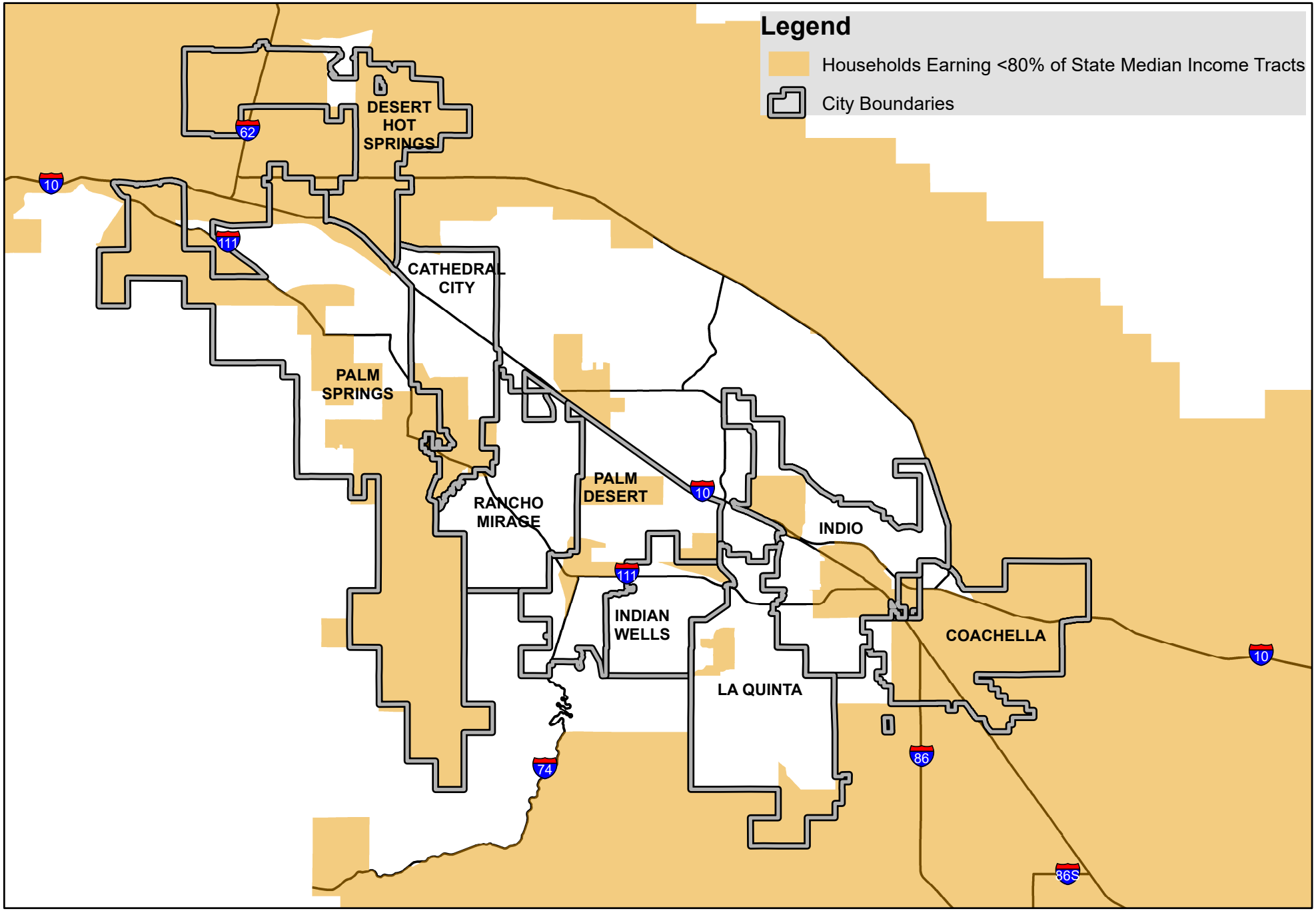
Attachments: Map of CalEnviroScreen 3.0 percentile scores
Map of schools with high rates of free and reduced-priced meals
Map of households earning less than 80% of state median income

CVAG

CalEnviroscreen 3.0 Percentile Scores



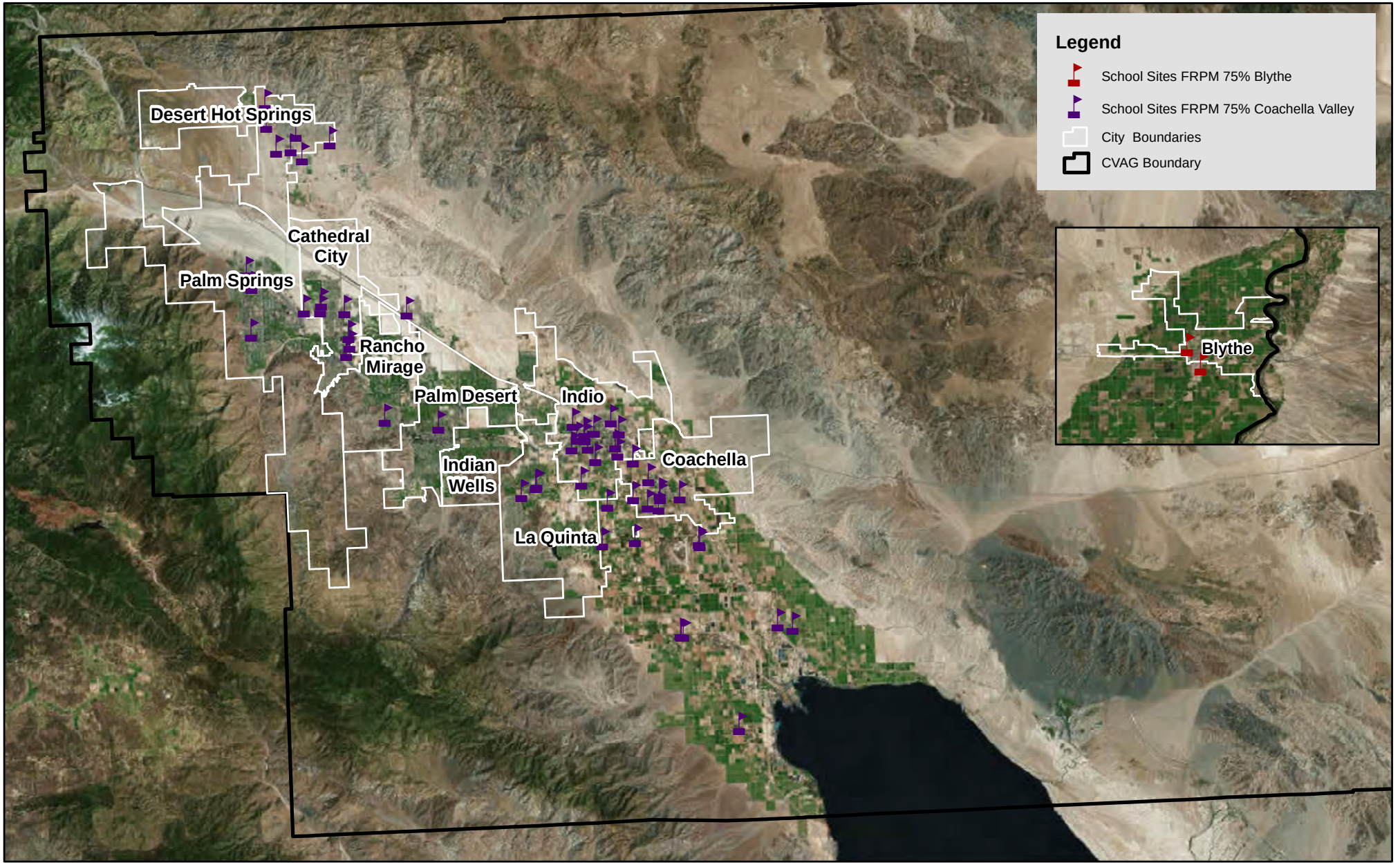
Households Earning Less Than 80% of State Median Income



CVAG

N

0 2.5 5 10 15 20 25 Miles

Z:\ovizcarra\Analysis folder\Jim\Maps Jim to Check\Less than 80% Median Household Income Tracts.mxd
10/21/2016

75% of School Students that are Eligible to Receive Free Reduced Priced Meals