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October 21, 2016

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

Via email to: CalEnviroScreen@oehha.ca.gov

Re: Comments on CalEnviroScreen Draft Version 3

Dear Ms. Flowers:

Environmental Health Coalition (EHC) is a 36-year-old environmental justice organization. EHC builds grassroots campaigns to confront the unjust consequences of toxic pollution, discriminatory land use, and unsustainable energy policies. Through leader development, organizing and advocacy, EHC improves the health of children, families, neighborhoods and the natural environment in the San Diego/Tijuana region.

EHC appreciates the opportunity to review the Draft Version 3 of CalEnviroScreen (CES3). We strongly support CalEnviroScreen as an environmental justice screening model, and also support OEHHA's continuing efforts to further develop the model, as well as to listen to and incorporate feedback from environmental justice advocates, community residents, and others.

EHC is a member organization of the California Environmental Justice Alliance (CEJA), and we concur with the comments on CES3 submitted to CalEPA by CEJA. Additional comments on indicators, and on further development of the uses of CalEnviroScreen, are below.

Comments on Indicators

Pollution Burden Indicators

Diesel PM. We believe that the revised methodology for the Diesel PM indicator more accurately identifies the census tracts that are highly impacted by diesel, particularly the residential western areas of National City that are downwind of the National City cargo terminal and the I-5 freeway.

Inclusion of Mexican Pollution Sources. We appreciate and support the effort to include pollution sources in Mexico that are impacting the environment on both sides of the

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border, as well as inclusion of air monitoring data from the new monitors near the border in San Ysidro and Otay Mesa.

Proximity Metric and ARB Facilities of Concern. We echo the comments in the CEJA letter that locally important sources of pollution and health impacts are not currently captured in CES. A proximity metric such as the one used in the EJSM would better capture the environmental health hazards of proximity to ports and railyards, for example. Incorporation of the ARB Facilities of Interest would add smaller pollution sources such as autobody shops, which are prominent features of the Old Town National City community.

Population Characteristics Indicators

Cost of Living Indicator. The new rent-adjusted income indicator is a worthwhile addition to the tool. High rent coupled with low income is a major stressor with many implications for health. In the San Diego region, the indicator works to identify communities where low-income residents are experiencing displacement due to increasing rents. EHC's members in Barrio Logan, National City, and City Heights strongly support inclusion of this indicator. At the same time, we understand this indicator may not work as well for communities in other areas, where transportation or other costs may be disproportionately high. Accordingly, we would be open to a cost of living indicator that combines costs of housing with other costs.

Age. We support elimination of the age indicator. San Diego EJ communities tend to be younger populations, with about 30% being under 18, and the age indicator did not work well. We are also open to inclusion of an age indicator based on the percentage of children in the population, as others have recommended.

Cardiovascular Indicator. This indicator does rank San Diego EJ communities highly, relative to other areas of the San Diego region. It is not clear to us if it changes the rankings of any San Diego tracts substantially, and we would be interested in seeing sensitivity analysis of this indicator.

Asthma Indicator. We continue to believe that the scores for the asthma indicator and many of the Population Characteristics are too low in the census tract that includes Old Town National City (06073021900), because the census tract data includes approximately 5,000 military personnel who are stationed on ships and don't actually live here.

Comments on Uses of CalEnviroScreen

Regional Ranking. We continue to urge OEHHA to develop a methodology for regional ranking – not to replace statewide ranking, but to use it in appropriate ways such as the City of San Diego’s Climate Action Plan, which uses CES to identify disadvantaged communities for prioritized action.

Precautionary Approaches. We urge CalEPA to develop more clarity on uses of CalEnviroScreen, and especially to consider using it for land use planning, permitting, siting, and enforcement.

Conclusion

Environmental Health Coalition supports Version 3 of CalEnviroScreen, with the modifications noted above. We applaud OEHHA for its continuing efforts to refine the model and incorporate feedback from environmental justice communities. We urge CalEPA to develop precautionary approaches to prevent and reduce environmental hazards in highly impacted communities as identified by CalEnviroScreen.

Sincerely,

A handwritten signature in blue ink that reads "Joy Williams". The signature is fluid and cursive, with "Joy" on the left and "Williams" on the right, connected by a horizontal line.

Joy Williams
Research Director