

October 21, 2016

Honorable Matt Rodriquez, Secretary  
California Environmental Protections Agency  
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Dr. Lauren Zeise, Acting Director  
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Secretary Rodriquez, Director Zeise:

OEHHA has revised its criteria for its CalEnviroScreen. The problem with this is I am not seeing the purpose for the revision. The new model as proposed in this draft is neither broadening the scope of the tool nor streamlining the process of applying the criteria.

The revision does not address the fact that this program misses so many populations that are seriously impacted by environmental factors. Though more criteria have been added, the pool of qualified populations has narrowed as a result. This smacks of elitism and reflects a lack of geographic and community diversity in the planning process.

It is understood that both the original and added criteria have as a requirement that there be data across all localities uniformly. I assume this is to ensure that you are comparing apples to apples and not to oranges. But impacted communities are made up of people not fruit. And, unfortunately for this policy, not all communities are the same, nor are the environments in which they live and work.

Unfortunately, not all counties have access to the same resources to track every single, relevant data point. This does not justify that you ignore those most at risk in these counties and let them fall through the cracks. As a regulatory agency you either create a mandate to require said data collection – and fund it – or you allow communities and counties to define qualifications most relevant to them. After all, poor environment and negative exposures happen on a micro-local level, how can you possibly define what is a risk qualification on macro-statewide scale.

If, as stated, CalEnviroScreen is truly about identifying, empowering, and working with environmental justice communities then this revision process needs to be a lot more inclusive. The principles of the environmental justice movement require efforts to stop corporations and governments defining communities and imposing conditions and policies on us. It appears with this revision that OEHHA is doing exactly such imposing. By defining the mandatory qualifications to participate in the program, and not allowing communities and those municipalities which most closely serve them to create those qualifications, you are in fact imposing your standards on EJ communities, and not allowing us to speak for ourselves.

It is for these reasons I request that this process be slowed down. I do not feel that the revisions, as drafted, should be accepted, put in place and implemented. If the draft should be accepted then I believe that OEHHA needs to redefine the mission of the CalEnviroServ tool removing any mention of environmental justice, and create either a separate more inclusive program incorporating EJ principles, or allow these types of funding opportunities to be designed for application on a county by county basis.

J. Michelle Pierce  
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