



October 21, 2016

Carolyn Flowers
Office of Environmental Health Hazard Assessment
P. O. Box 4010
Sacramento, California 95812-4010
(916) 324-7572

Re: CalEnviroScreen 3.0 Update

Thank you for the opportunity to provide comments on the 3.0 update of CalEnviroScreen. Our staff was able to attend a workshop and a webinar. The Safe Routes to School National Partnership appreciates OEHHA's coordinated effort to conduct statewide public workshops to disseminate information on the 3.0 draft. CalEnviroScreen is a critical and innovative tool that serves in both identifying environmental justice communities and a stream for the funding to be reinvested in communities. In terms of version 3.0 update, we appreciate that the tool includes updated data and indicators that will aid to identify more communities who are vulnerable to environmental hazards, health disparities and climate change effects. Based on the information provided at the workshops and webinars, we would like to provide feedback on two specific categories that we think will make version 3.0 a stronger tool:

1. Feedback on indicator changes
2. How CalEnviroScreen can be better utilized at the local level.

1. Feedback on 3.0 changes

We recommend reinstating data on youth under 18 in the 3.0 draft

We are concerned with the removal of age, specifically the children indicator from the 3.0 draft. Children, especially children of color, are a vulnerable population to environmental hazards. For example, In Riverside County's Jurupa Valley, at least 11 schools are located within the smog-filled zones near highways. A study found that children residing in this area had the weakest lung capacity and the slowest lung growth of all children in the region due to exposure to diesel exhaust;^[i] the majority of these children are Latino and live in low-income neighborhoods. Overall, children within the region were found to be highly prone to conditions such as asthma – cardiovascular diseases often associated with poor air quality – with children in low-income areas and children of color especially at risk. It is important to capture the data of children's exposure to environmental hazards. Excluding children in the index and simply relying on asthma rates alone to capture data on children's health

does not fully explain the narrative around the issues. Furthermore, many co-linear components exist in the CalEnviroScreen. The youth component is helpful for many of the other indicators and helps paint a larger narrative of a region's demographic needs. As proponents of health for children and families, the National Partnership sees the importance of data on our youth as a way to uplift vulnerable communities and how investments can be made in those regions. We would also call for the Youth indicator to include a calculation of the population of children within each census tract, with higher scores given to tracts with higher percentages of children. Data on youth under 18 can particularly play a useful role in Safe Routes to School applications for the Active Transportation Program, in which demographics on youth are absolutely necessary.

We recommend an evaluation on the proposed measure of Rental Adjusted income and inclusion of Transportation Burden

We applaud OEHHA for the inclusion of metrics that examine the burdens of rental on vulnerable communities. We recommend OEHHA also examine the measure closely as it may have affected low-income census tracts such as rural areas of San Bernardino County, which resulted in their deletion in the 3.0 draft. We recommend special consideration be examined on rural communities and their respective rental markets. Furthermore, low-income households not only cope with housing costs but also transportation costs. Low-income residents have suffered high transportation costs due to job mismatch issues. By including data around transportation burdens, we will also be able to create a narrative around how housing relates to needs for transportation infrastructure.

2. How CalEnviroScreen can be better utilized by local agencies

We recommend OEHHA provide more information on how the CalEnviroScreen can be a resource

The CalEnviroScreen is becoming an important tool to identify environmental justice communities and also how investments are brought into communities. With the passage of Senate Bill 1000, local agencies will need to update general plans to an element examining the effects of local land use decisions on its environmental justice communities. Thus, CalEnviroScreen will become an important tool in the update process of general plans across the state. We recommend that OEHHA reach out and provide guidance to local agencies on the tool and how it can be used during the update process of environmental justice elements. Furthermore, we recommend that outreach to local agencies also provide a catalog of programs that currently use (or intend to use) CalEnviroScreen as an eligibility factor. The Greenhouse Gas Reduction Fund (GGRF) hosts a number of programs which greatly determine eligibility based on scoring from the CalEnviroScreen. It would be helpful if OEHHA can help connect local agencies, especially smaller agencies to these programs in order to bring more investments to low-income and environmentally burdened communities. We also recommend OEHHA develop a methodology for regional rankings and publish the dataset on as a resource available online. By publishing data on top environmental justice communities, local jurisdictions and community based organizations can reference CalEnviroScreen information in a way that will allow for more utilization in a wider net of uses outside of grant opportunities. Again, this information can help with local agency efforts to update General Plan elements related to EJ or Climate Action plans.

We have been tracking the CalEnviroScreen tool especially because of its use in the Active Transportation Program, as well as other GGRF programs. We have seen first hand, how powerful the data can be used to bring awareness around environmental justice communities. We appreciate the time and consideration that OEHHA staff has contributed to the various workshops across the state. We applaud your outreach efforts on the draft update and we look forward to working with staff in the future.

Sincerely,
Safe Routes to School National Partnership

Demi Espinoza, Southern California Regional Policy Manager
Marty Martinez, Northern California Regional Policy Manager
Andrew Pasillas, Southern California Regional Policy Manager
Bill Sadler, Senior California Policy Manager

[i] Jurupa Valley General Plan pg. 13,
