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Submitted electronically to: CalEnviroScreen@oehha.ca.gov

October 20, 2016

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

RE: Comments on CalEnviroScreen, Version 3.0 Draft

Dear Ms. Flowers:

Staff of the Southern California Association of Governments (SCAG) appreciates the opportunity to provide comments on the draft Version 3.0 of the CalEnviroScreen tool. SCAG applauds the efforts made by OEHHA and CalEPA in reaching out to our communities through the conduct of demonstrative workshops in Los Angeles on September 7th, San Bernardino on September 8th, and Calexico on September 14th. These very well administered events served to demonstrate to our local stakeholders the enhanced capabilities of the revised tool in a very engaging, hands-on manner.

The two new indicators included in Version 3.0, which account for rent-adjusted income and incidence of cardiovascular disease, serve to further enhance the capability of the tool for identifying communities facing disproportionate environmental burdens. We also believe that the incorporation of data addressing cross-border pollution sources will facilitate a more realistic accounting of the pollution burdens encountered by residents in areas of Imperial County that lie adjacent to the Mexican border. We encourage OEHHA to continue to refine this tool as new data and additional relevant data sources become available.

While most of the feedback we have received from our regional stakeholders has been very positive regarding this most recent version of the CalEnviroScreen tool, one key comment that has been brought to our attention is the potential negative connotation associated with the use of the term 'disadvantaged communities' in reference to those areas that are included among the top 25 percent of statewide census tracts in the CalEnviroScreen analysis. While we understand the purpose of the tool for identifying environmentally disadvantaged communities in fulfillment of provisions of California Senate Bill 535, we request that an alternative, more neutral term be used to denote these disproportionately burdened communities such as, for example, "SB 535 Eligible Communities."

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We understand that based on the input received during this comment period, OEHHA will continue to refine CalEnviroScreen Version 3.0 Draft to maximize its utility. We look forward to continuing to assist OEHHA on the development of this important tool. If you should have any questions regarding our comments, please do not hesitate to contact Ms. Huasha Liu, Director of Land Use and Environmental Planning, at (213) 236-1838 or by email at liu@scag.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Hasan Ikhata". The signature is fluid and cursive, with a prominent loop at the end.

Hasan Ikhata
Executive Director