



Environmental Justice Air Quality Coalition • Immigrant Power
for Environmental Health and Justice • Regional Asthma
Management and Prevention Initiative • Healthy 880 Collaborative

CalEnviroScreen

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SUBMITTED via EMAIL and ONLINE via electronic submittal form

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RE: Investment of cap-and-trade revenue to benefit impacted or “disadvantaged” communities

September 2, 2014

I am writing on behalf of the Bay Area Environmental Collaborative (BAEHC), a broad partnership among diverse organizations working to protect public health in communities most heavily impacted by air pollution in the San Francisco Bay Area region. BAEHC’s mission is to ensure better health for residents through measures to reduce air cumulative pollution, particularly in heavily burdened areas and for those especially vulnerable to the impacts of exposure.

BAEHC strongly supports prioritizing state funds to benefit communities most impacted or “disadvantaged” by the adverse effects of air pollution. We strongly support the development and implementation of the CalEnviroScreen, which could be an effective tool to evaluate cumulative impacts and identify such communities. We have vital concerns, however, about the statewide application and scoring of a tool that fails to identify as “disadvantaged” areas known to be the among the poorest and most burdened by air pollution in the densely populated Bay Area region.

While BAEHC does not support the “cap and trade” approach to pollution reduction, it is critical that revenue generated under the state program actually benefit communities suffering the greatest pollution impacts, as envisioned under the law. SB535 requires 25% of funds to benefit “disadvantaged” communities and at least 10% to be directly invested within these communities. Certain Bay Area communities have already been identified as among the most affected in the region, with some of the greatest health impacts in the state, yet are omitted by the current proposal. The application of the CalEnviroScreen tool on a statewide basis with the proposed scoring method is therefore flawed and insufficient to determine which “disadvantaged” communities should benefit under SB535. With hundreds of millions of investment dollars at stake, it is vital that CalEPA/CARB make a proper determination, as envisioned under the law, to benefit the most heavily burdened communities – including parts of West Oakland and Richmond, and Bayview Hunters Point in San Francisco, which suffer some of the greatest health impacts and are among the poorest areas in our urban region.

According to the BAAQMD, the proposed CalEnviroScreen scoring method identifies less than 3% of Bay Area census tracts in the top 20% statewide, despite serious health burdens that rank in the top 20% statewide, such as asthma and low birth weight infants (two health indicators used in the CalEnviroScreen). Even with a 25% threshold, the proposed scoring method would only identify 5% of census tracts in the region as

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“disadvantaged.” The tool as applied fails to designate areas with some of the worst pollution health impacts in the state as “disadvantaged,” underrepresenting the Bay Area region by omitting communities that should certainly benefit from funds under SB535.

BAEHC supports recommendations to improve application of the CalEnviroScreen to ensure that the most impacted areas in the hardest hit regions will benefit from investments of revenue generated under state programs. We strongly support use of **regional rankings** rather than statewide rankings, taking into account *localized* impacts in each of the most burdened regions, to determine which communities are “disadvantaged” and should benefit under SB535. Similarly, a **population** based approach would more equitably allocate funds than an across the board statewide approach.

The proposed scoring method also fails to consider the relative importance of indicators (with limited exception for environmental effects, weighted at half value). **Weighting certain indicators** such as **health impacts** and other social determinants affecting vulnerability including poverty would more accurately identify communities that are “disadvantaged” by pollution, such as those omitted by the proposed method even though they rank among the poorest and most exposed in the Bay Area region.

The **poverty** indicator also fails to take into account the rising **cost of living** in the Bay Area region, including housing costs, security and other socioeconomic factors that should be included in this important indicator. Ignoring regional differences in cost of living inequitably substantially biases low-income populations that may be more vulnerable to pollution impacts.

In addition, certain *exposure* indicators should be weighted to incorporate their relative significance. The local impact from exposure to **diesel-PM** is direct and far greater than exposure to ozone, for instance. Prioritizing exposure to more harmful pollutants would be more accurate and would highlight Bay Area communities currently omitted, despite that they are among the worst in the state.

Finally, the **thresholds** under consideration should be broadened to ensure that the most impacted communities in the most populated and burdened regions will benefit. While we strongly support regional rankings rather than a statewide approach, a **30%** threshold should be used with a statewide approach, rather than proposed thresholds of up to just 25%.

BAEHC looks forward to broad application of the CalEnviroScreen tool to help achieve Environmental Justice in the Bay Area region and across California. With the above recommendations, we believe this could be a vital tool for communities and agencies to better understand and address cumulative pollution impacts, and in this instance, provide guidance for determining how to prioritize state funds to benefit the most impacted or “disadvantaged” communities. Thank you for this opportunity to provide input.

Best regards,



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On behalf of the Bay Area Environmental Health Collaborative