

The City Project supports improving the CalEnviroScreen tool to identify underserved communities and prioritize funds under SB 535.

We recommend the following.

- (1) Reinstate race, color, and national origin data in CES.
- (2) Include green access with pollution burdens and population characteristics.
- (3) Public documents should refer to “underserved communities” rather than “disadvantaged communities.”

These are the reasons for these recommendations.

We have mapped and analyzed race, color, and national origin along with pollution burdens and population characteristics.

The maps are worth a thousand words. The maps dramatically show that people of color disproportionately live in the most burdened areas for pollution and health risks. We cannot fix the problem if we do not understand it.

These are the facts.

- In the most burdened areas 89% of the people are of color. Only 11% are non-Hispanic white people. Statewide the population average is 58% people of color.
- In the least burdened areas, only 31% of the people are of color. 69% are non-Hispanic white people.
- The most burdened areas also lack green space.

Federal law in fact *requires* data gathering where, as here, there is evidence of disparities based on race, color, or national origin. The problem is race based. There may nevertheless be racially neutral solutions.

Arguments that Prop 209, Prop 187, or other state laws prohibit an agency from collecting, analyzing, publishing, or using data based on race, color, or national origin related to health and the environment are wrong, harmful, and prejudicial.

California voters rejected Prop 54 in 2003, which would have banned the state from collecting data based on race, color, or national origin. Prop 209 addresses affirmative action in university admissions and state employment and has no application here. Prop 187, which attempted to limit immigrant services, was declared unconstitutional years ago.

We will be submitting detailed public comments with additional authorities by the September 9 deadline. We look forward to working with the SB 535 Coalition and others on this.

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**DRAFT**


### CalEnviroScreen 2.0 Score

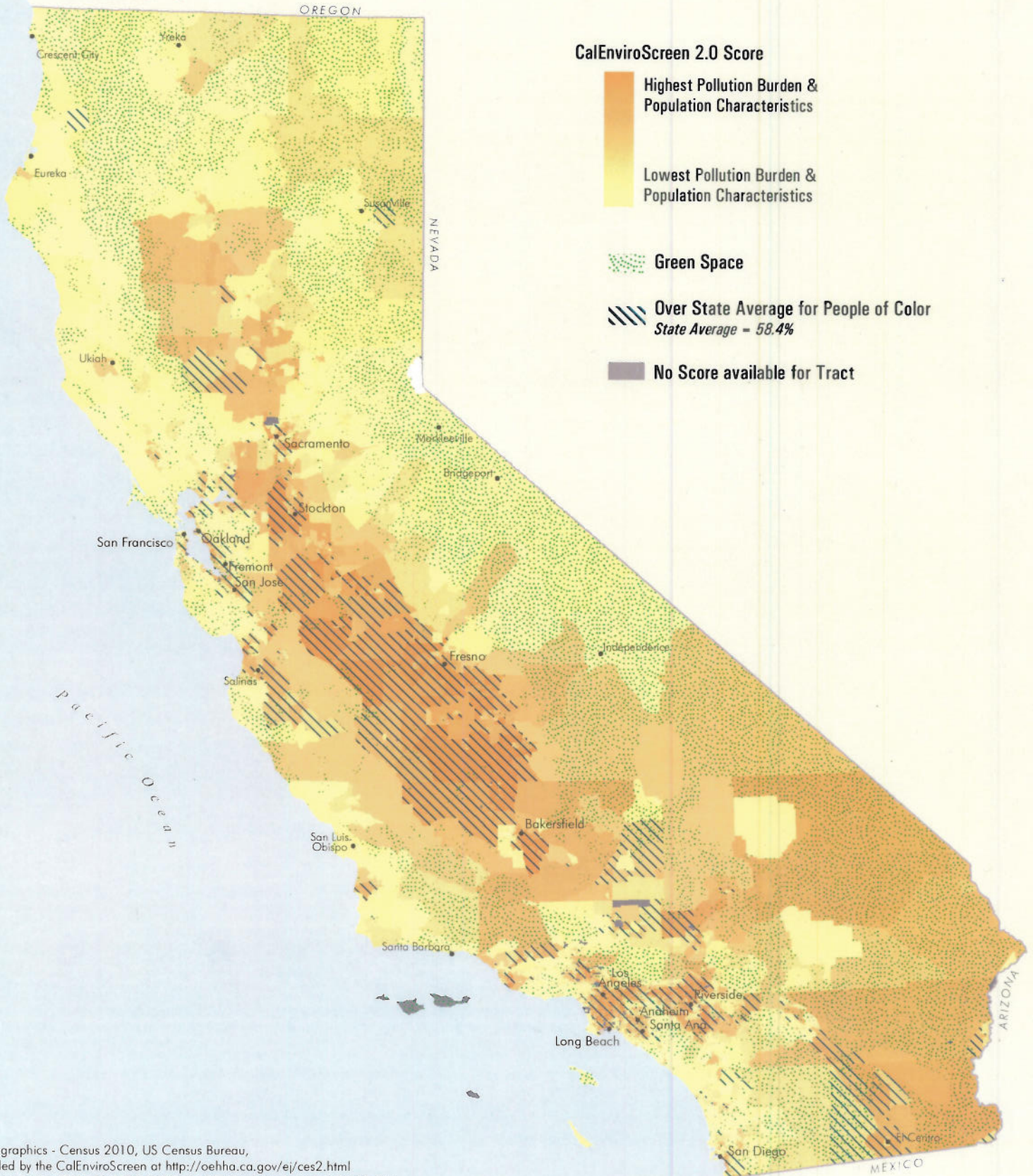
 Highest Pollution Burden & Population Characteristics

 Lowest Pollution Burden & Population Characteristics

 Green Space

 Over State Average for People of Color  
State Average = 58.4%

 No Score available for Tract



Demographics - Census 2010, US Census Bureau,  
 provided by the CalEnviroScreen at <http://oehha.ca.gov/ej/ces2.html>  
 CalEnviroScreen 2.0 - The CES 2.0 Score identifies communities in California  
 most burdened by pollution from multiple sources and most vulnerable to its effects, taking into account their  
 socioeconomic characteristics and underlying health status. <http://www.oehha.ca.gov/ej/ces2.html>  
 Green Space is California's Protected Areas Database (CPAD 2014a).  
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