

Comments on:
CalEPA Identification of DACs and CalEnviroScreen
ARB Interim Guidance on Investments to Benefit DACs

From Catherine Martineau
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Dear Sir or Madam,

Canopy is an urban forestry nonprofit group that plants and cares for trees in the San Francisco Mid-Peninsula (San Mateo and Santa Clara Counties) primarily in disadvantaged and underserved communities with an emphasis on public school campuses that severely lack trees, green spaces and access to nature. See <http://canopy.org/programs/tree-planting/healthy-trees-healthy-kids/>

We appreciate the efforts made to bring CES2 closer to the realities faced by those who combat environmental injustice. However we fear that CalEnviroScreen 2 (CES2) will rule out Cal Fire funding for projects that benefit disadvantaged populations in Unincorporated Redwood City, eastern Menlo Park, East Palo Alto, and Mountain View. At this time none of the CES2 environmental measurements capture “the green gap”, the striking inequity in tree canopy cover, and access to parks and nature, that these communities face.

For instance, no one in California would dispute that East Palo Alto is a Disadvantaged Community. However, depending on the cutpoint threshold applied to CES2, projects such as street, school, and park trees plantings located within East Palo Alto borders could be excluded.

We urge you to select for CES2 a score calculation method that ensures that all disadvantaged populations qualify (such as Method 6) and set the cutpoint threshold no lower than 25%.

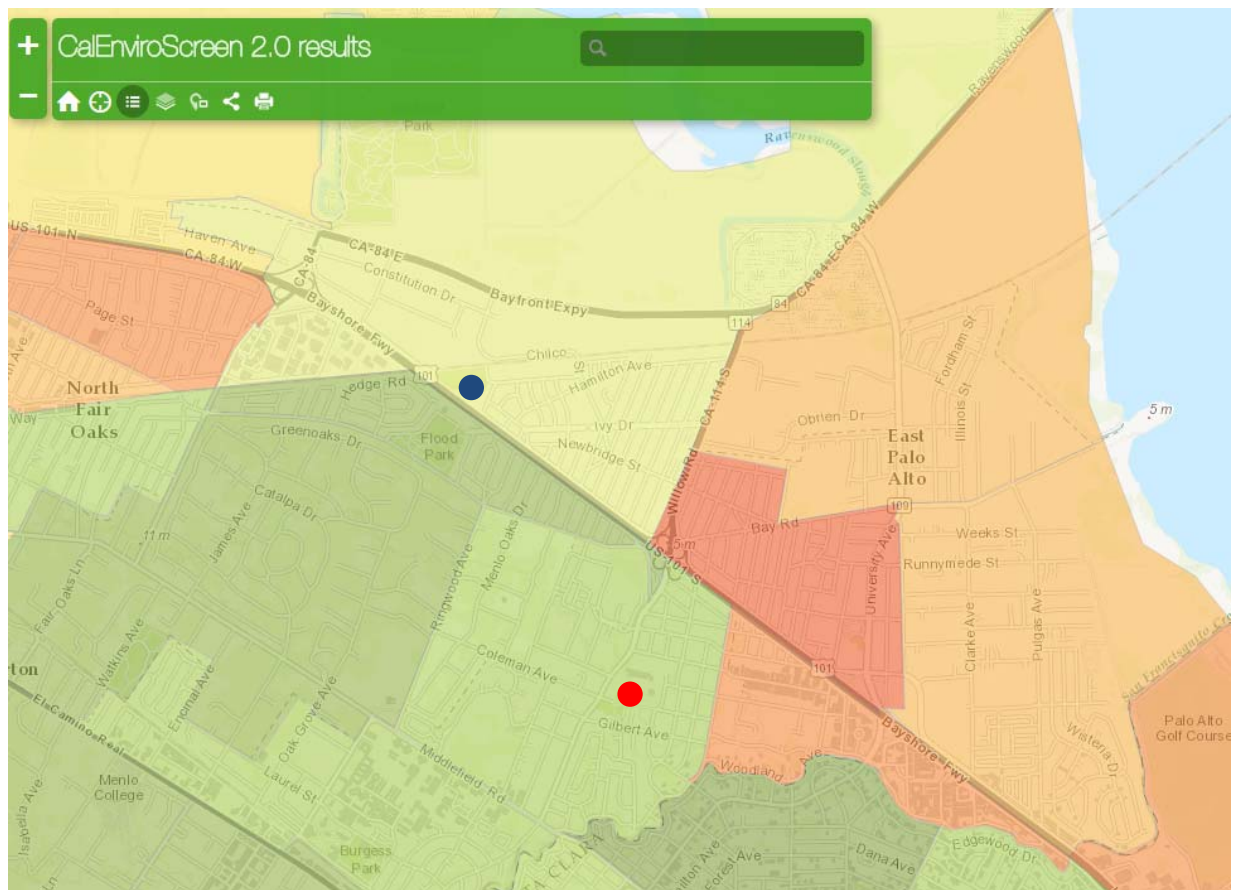
We also respectfully request that you consider the possibility of modified threshold levels for schools, or at least Title 1 schools. Children are a special case that is not adequately captured by averages at the census tract level. They are the population most vulnerable to pollution burden and are disproportionately socio-economically disadvantaged.

For example, as illustrated in the uploaded document, Willow Oaks Elementary, a Title 1 Ravenswood City School District (RCSD) school is located in Menlo Park Census Tract #6081613900 with a CES2 score of 14.45, in the 21-25th percentile range. BUT over 95% of Willow Oaks students actually live in East Palo Alto and 96.4% of students are socioeconomically disadvantaged. Belle Haven Elementary, also a RCSD Title 1 school with similar demographics is in the same situation with respect to CES2 score. Additionally kids from this community disproportionately suffer from asthma according to county hospitalization data.

This situation is repeated at multiple schools that serve disadvantaged populations in Unincorporated Redwood City and Mountain View.

Thank you for the opportunity to comment.

Illustrations for Catherine Martineau's Comments



- Willow Oaks Elementary
- Belle Haven Elementary

The location of two schools serving disadvantaged children is shown on the CalEnviroScreen map above.

- Willow Oaks Elementary, a Title 1 Ravenswood City School District (RCSD) school is located in Census Tract #6081613900 with a CES2 score of 14.45, in the 21-25th percentile range.
- Belle Haven Elementary, also a RCSD Title 1 school is located in Census Tract # 6081611700 with a CES2 score of 23.37, in the 46-50th percentile range.

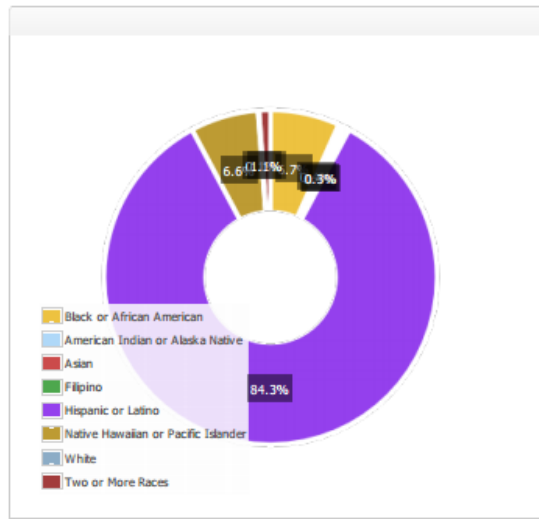
However at both schools ,over 90% of students are socioeconomically disadvantaged, and more than 75% are English learners. (See each school demographic data below.)

Willow Oaks Elementary Demographics

Last updated: 1/26/2014

Student Enrollment by Student Group (School Year 2012-13)

Group	Percent of Total Enrollment
Black or African American	6.7
American Indian or Alaska Native	0.4
Asian	0.4
Filipino	0.3
Hispanic or Latino	84.3
Native Hawaiian or Pacific Islander	6.6
White	0.1
Two or More Races	1.1
Socioeconomically Disadvantaged	96.4
English Learners	81.6
Students with Disabilities	7.9



Belle Haven Elementary Demographics

Last updated: 1/25/2014

Student Enrollment by Student Group (School Year 2012-13)

Group	Percent of Total Enrollment
Black or African American	8.3
American Indian or Alaska Native	0.2
Asian	0.7
Filipino	0.2
Hispanic or Latino	81.0
Native Hawaiian or Pacific Islander	8.7
White	0.4
Two or More Races	0.5
Socioeconomically Disadvantaged	93.4
English Learners	75.5
Students with Disabilities	6.6

