



September 15, 2014

Matthew Rodriguez, Secretary  
California Environmental Protection Agency  
1001 I Street, P.O. Box 2815  
Sacramento, CA 95812

Mary Nichols, Chairman  
California Air Resources Board  
1001 I Street, P.O. Box 2815  
Sacramento, CA 95812

**RE: CalEnviroScreen 2.0 and Interim Guidance to Agencies Administering Greenhouse Gas Reduction**

Dear Secretary Rodriguez and Chairman Nichols:

The City and County of San Francisco respectfully offers the following comments to the California Environmental Protection Agency (CalEPA) on its CalEnviroScreen 2.0 and to the California Air Resources Board (ARB) on its Interim Guidance to Agencies Administering Greenhouse Gas Reduction Fund Monies. San Francisco notes and incorporates by reference additional comments submitted by the San Francisco Municipal Transportation Agency on this matter.

The City and County of San Francisco strongly supports the intent of SB 535 (DeLeón, 2012) and SB 862 (2014) to ensure that at least 25% of the Greenhouse Gas Reduction Fund monies be used for investments located within and for the benefit of disadvantaged communities. San Francisco believes the goal to reduce greenhouse gases and transform California's most vulnerable communities with prioritized investments from the Greenhouse Gas Reduction Fund is important and we look forward to working with the State.

San Francisco appreciates the years of work that CalEPA has invested in creating CalEnviroScreen (CES 2.0). However, while supporting the goals of SB 535 and CalEnviroScreen, we are very concerned that the current method significantly understates the number of disadvantaged communities (DAC) in the City and County of San Francisco and in the Bay Area region.

***CalEnviroScreen's Method 1 excludes significant parts of San Francisco that are disadvantaged.*** San Francisco is concerned that Method 1 excludes many economically disadvantaged and health impacted communities, precisely the kinds of communities SB 535 envisions for transformation. The Bayview Hunters Point neighborhood, for example, is a well-



established environmental justice community and is identified as an impacted community by other assessment tools such as the Bay Area Air Quality Management District's Community Air Risk Evaluation methodology. The neighborhood has well-documented exposures to environmental pollution, high levels of health disparities, and high rates of poverty and other socio-economic challenges.

Additionally, Treasure Island in San Francisco has a special population that is characterized by a high percentage of formerly homeless or incarcerated individuals, as well as the highest preventable hospitalization rates (including asthma) in the county. It is also a former naval base and is in 100th percentile for cleanup sites. Due to its elevation, it is also extremely vulnerable to sea level rise.

CES 2.0 Method 1, at the 20 percent cut point, identifies only one census tract in San Francisco as a disadvantaged community. For context, there are 69 census tracts in San Francisco where more than 30 percent of the residents live at or below the poverty line. There are 26 census tracts where over 50 percent of the population is living below the poverty line. There are 12 census tracts where more than 30 percent of residents spend over 50 percent of income on rent.

In the Bay Area region, CES 2.0 Method 1 identifies fewer than 3 percent of the Bay Area census tracts as disadvantaged, although many more are truly disadvantaged. Of the top 10 most impoverished census tracts in the region – where poverty rates exceed 70 percent – not a single one is included in Method 1. Of the 46 census tracts that are identified by Method 1, 20 are census tracts where the poverty rate is below 50 percent.

CalEPA's proposed Method 1 requires that in order for a census tract to be identified as a DAC, it must score medium-high on virtually all 19 criteria. Under this approach, many communities that are severely disadvantaged in terms of key health factors, such as income, air quality, asthma rates and low birth weights fall outside of the top 20 percent threshold. These two San Francisco neighborhoods – Bayview Hunters Point and Treasure Island – exemplify how CES 2.0 under counts communities that rank very high for a few pollution indicators, such as Diesel PM and cleanup sites, with a bias towards areas that have many moderately high indicators.

***The City and County of San Francisco requests that CalEPA consider an alternate approach to determining DACs and favors the use of the Bay Area Air Quality Management District's (BAAQMD) "Method 6."*** BAAQMD's method proposes an alternative method for calculating a cumulative score of the CES 2.0 variables for each census tract. Method 6 is advantageous because it relies on CalEPA's indicator data and ensures that communities with top ranks in a few indicators will be better represented. For example, although none of the top 10 most impoverished census tracts in the Bay Area are identified by CES 2.0 Method 1, half of these census tracts are now identified by utilizing Method 6. Furthermore, SB 535 clearly allows CalEPA to use population based metrics *or* environmental metrics when establishing its definition of DACs. We believe using Method 6 is the most consistent with SB 535's intent to



identify disadvantaged communities with the top scores in either pollution burdens *or* economic/health burdens and more accurately represents DACs in San Francisco.

In addition to choosing Method 6, the City and County of San Francisco recommends the following:

- ***Add “rent burden” as a new criteria.*** Account for the significant cost of living differences across the state, especially for low-income residents who live in areas of high housing costs such as San Francisco, by adding rent burden. Rent burden is a factor expressly listed in SB 535 as an option, but one not chosen by CalEPA.
- ***Weight indicators to account for health impacts or remove ½ weights from Environmental Effects indicators.*** Strong health evidence suggests Diesel PM has greater health impacts than other pollution burden indicators, such as ozone, but both are weighted equally.
- ***Supplement the Pesticide Use indicator with urban pesticide exposure data, or drop the Pesticide Use indicator altogether.*** The data set only includes agricultural pesticide use while urban areas receive a score of zero. There is considerable evidence that urban residents, especially in low-income housing developments, can be exposed to pesticides at significant levels and should be considered.
- ***Refine the PM 2.5 indicator.*** San Francisco’s largest pollution burden is from traffic related air pollution, specifically PM 2.5. The mean annual concentration for all of the CES 2.0 measurements for all census tracts in San Francisco is approximately 7.38. This data is based on one California Air Resources Board station located at the foot of Potrero Hill (Arkansas and 16<sup>th</sup>) and is not representative of air quality in heavily trafficked parts of the City. Our data shows that PM 2.5 in San Francisco is closely correlated with proximity to traffic volumes and proximity to freeways, but this value does not change based on proximity to heavily trafficked roadways in CES 2.0. Rigorous modeling, based on both traffic related and static sources of air pollution, has been conducted by the San Francisco Public Health Department and BAAQMD and shows that significant areas in San Francisco have levels of air pollution that are hazardous to health. With that model, we see PM 2.5 concentration ranges from 8 to over 18ug/m3.

***Finally, San Francisco recommends setting the cut point for determining disadvantaged communities at the top 30 percent.*** Given this is the first year using CES 2.0 for the purposes of identifying DACs, we believe it is important to choose a cut point that does not inadvertently exclude known environmental justice communities, such as Bayview Hunters Point, while giving CalEPA time to further refine its data sets and methodology in the future. Moreover, a 30 percent cut point will allow more disadvantaged communities to be eligible for funding and allow for



more potential projects and innovative ideas to be submitted to reduce greenhouse gas emissions and transform communities in need.

Designation as a DAC by CalEnviroScreen determines eligibility for funding in particular categories. Although potentially 75 percent of the overall Greenhouse Gas Reduction Fund may be available for projects outside of DACs, in some programs, 100 percent of the funds are only available to projects that provide benefits to DACs. Therefore, communities not designated as a DAC would not be eligible for any funding in a program that has designated 100 percent for DACs. While a cut point for DACs to the top 30% will expand the number of census tracts eligible for funding, ARB should also consider focusing investments in the Interim Guidelines to low-income residents and households within DACs where possible to ensure benefits are maximized to those most in need.

Again, the City and County of San Francisco appreciates the opportunity to work with your agencies on appropriately identifying disadvantaged communities to ensure that the intent of S.B. 535 is implemented. We submit our concerns with a deep commitment to work with both CalEPA and the Air Resources Board on the best possible solutions to these issues for the people of San Francisco.

If you have any questions regarding these comments, please contact me directly, [Roger.Kim@sfgov.org](mailto:Roger.Kim@sfgov.org) or (415) 554-6973.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger Kim", written over a circular stamp.

Roger Kim  
Senior Advisor to Mayor Edwin M. Lee

cc: San Francisco Legislative Delegation