



May 1, 2014

Ken Alex, Director  
Governor's Office of Planning and Research  
P.O. Box 3044  
Sacramento, CA 95812-3044  
VIA EMAIL: ca.50m@opr.ca.gov

Re: Comments on Environmental Goals and Policy Report

Dear Mr. Alex:

On behalf of the California Pan-Ethnic Health Network (CPEHN), thank you for the opportunity to provide comments on the Office of Planning and Research's (OPR) "California @ 50 Million – California's Climate Future," draft Environmental Goals and Policy Report (EGPR). The EGPR is an important vision for the state in light of impending population shifts, environmental and economic challenges, and new policies that emphasize the integration of health and the environment.

The discussion draft provides innovative steps towards addressing the challenges and opportunities facing California. For example, we applaud OPR for including a section entitled, "Building Healthy and Sustainable Communities." However, this draft does not adequately incorporate the needs of California's diverse communities. Given that communities of color make up nearly 60% of California's population and face some of the state's most challenging health disparities, the EGPR should better incorporate the perspectives and impacts environmental decisions have on communities of color. Below are recommendations on how equity and health could be better integrated throughout the EGPR.

**Recommendation: The increasing diversity of California's population should be better reflected in the Report's goals.**

Since 2000, the majority of California's population has been communities of color, comprising 60% of the state's residents.<sup>i</sup> Currently, Latinos are 38% of the population and are expected to be 42% by 2025.<sup>ii</sup> Latino children are already 52% of the population age 12 and younger.<sup>iii</sup> Our state is also home to the largest Asian American and fifth largest African American populations in the nation.<sup>iv</sup> By 2050, communities of color are expected to be 75% of California's population.<sup>v</sup> Any environmental vision for the future of our state should explicitly acknowledge these population shifts and account for the specific needs of California's communities of color.

Communities of color face far greater incidences and types of health disparities. The rates of asthma, obesity, diabetes, and certain cancers are much higher among communities of color compared to Whites. While many factors contribute to health

BOARD OF DIRECTORS

Jacque Anderson  
Chief Operating Officer  
Community Catalyst

Jennifer Hernández, MPP  
Founder and Partner  
Cultivo Consulting

Kathy Ko Chin, MS  
President and Chief Executive Officer  
Asian & Pacific Islander American  
Health Forum

Mark LeBeau  
Executive Director  
California Rural  
Indian Health Board

B. Darcel Lee  
Executive Director  
California Black Health Network

Donzella Lee, MPH, CHES  
Interim Policy Director  
for Healthcare Systems  
Community Health Councils

David J. Lent  
Executive Director  
Toiyabe Indian Health Project, Inc.

Tana Lepule  
Executive Director  
Empowering Pacific Islander Communities

Alma Martinez  
Radio Bilingue

Nayamin Martinez, MPH  
Program Manager  
Alliance for California Traditional Arts

Xavier Morales, PhD  
Executive Director  
Latino Coalition for a  
Healthy California

Ninez Ponce, MPP, PhD  
Professor, Department of Health Policy  
and Management, UCLA Fielding School  
of Public Health  
Principal Investigator, California Health  
Interview Survey, UCLA Center for Health  
Policy Research

Poki Stewart Namkung, MD, MPH

Dong Suh, MPP  
Associate Director  
Asian Health Services

Pete White  
Founder/Executive Director  
Los Angeles Community Action Network

Ignatius Bau  
Interim Executive Director

disparities, the environments in which we live, work, and play have a tremendous impact on our health. Communities of color also tend to reside in areas that face greater environmental challenges. For example, Latinos make up 77% of Imperial County, 57% of Tulare County, and 45% of the Inland Empire's populations, all of which face severe environmental challenges including poor air quality and lack of affordable, clean drinking water.<sup>vi</sup>

The EGPR must recognize that each community has different needs, poses great opportunities, and faces significant challenges. These communities have unique contributions as well as specific needs that must be addressed in order for our state to prosper. Therefore, we recommend that the perspectives and needs of California's communities of color be better reflected throughout the EGPR.

**Recommendation: The EGPR should make a stronger connection between improved health and the environment.**

Extensive research documents how our health is largely determined by the physical, social, and economic environments in which we live, work, and learn. These factors determine everything from the quality of our air and housing to our access to fresh healthy foods and safe parks. For example:

- Children living within 500 feet of busy roadways have increased risk of asthma and other respiratory problems.<sup>vii</sup>
- Access and proximity to safe places for physical activity, including parks, are significant predictors of physical activity levels.<sup>viii</sup>
- Accessible neighborhood grocery stores reduce diet-related diseases, and distance to a full service grocery store is related to body mass index.<sup>ix</sup>
- Proximity to and mix of retail, quality destinations, and transportation mode choices are the most influential factors in people's decisions to walk.<sup>x</sup>

Communities of color are less likely to live in neighborhoods where the conditions support improved health. CPEHN has analyzed a number of determinants of health and where communities of color reside and a very stark pattern emerged: neighborhoods with lower incomes and less educational attainment were most likely to display environmental conditions that negatively impact health. For example, a resident of the Newport Beach-Laguna Hills area in Orange County is 15 times more likely to have a bachelor's degree, earns \$33,000 or more per year, and can expect to live 15 years longer than a resident of Watts in Los Angeles, a community with a majority of people of color, while Newport Beach is over 87% White.<sup>xi</sup> In California, the majority of people living in neighborhoods with these challenges are from communities of color.

Another specific example of where social, economic, and environmental policies coincide with significantly negative health impacts on low-income communities of color is in the Central Valley. A report by the Center for Race, Poverty, and the Environment found that Central Valley residents breathe some of the dirtiest air in the nation. From 2006-08, the San Joaquin Valley exceeded the federal 8-hour smog standard on 455 days.<sup>xii</sup> The asthma rate for the eight San Joaquin Valley counties (17.3%) is over 20% higher than the average for the state (13.7%).<sup>xiii</sup> Residents of color in the Valley are also disproportionately exposed to facilities that are harmful to the environment and health. Two out of California's three toxic waste dumps are located in low-income, predominately Latino farm-worker communities.<sup>xiv</sup> These communities lack access to safe, clean, and affordable drinking water and do not have access to basic infrastructure, including sidewalks, curbs, sewer,

and storm drains.<sup>xv</sup> While the Central Valley's agricultural industry generated \$25.3 billion dollars, over 70% of the state's entire agriculture revenue in 2008, residents of the Central Valley had some of the lowest incomes and highest unemployment rates in the state and nation.<sup>xvi</sup> Communities of color in the Central Valley, particularly Latinos, are further disenfranchised because while they are the majority of residents in the Valley, they constitute a minority on decision-making bodies that govern the region.<sup>xvii</sup>

The policy decisions that influence land use, neighborhood, environmental, and transportation designs have a profound and direct impact on our health. Therefore, the EGPR should explicitly acknowledge the negative and positive health impacts of policy decisions and explicitly include health indicators to the measure progress of policy decisions to ensure they do not exacerbate health disparities.

**Recommendation: The EGPR needs to highlight and address the disproportionate impact of climate change on communities of color.**

We appreciate the EGPR's emphasis on the need to address climate change in California. However, to combat the deleterious impacts of climate change, we must also address the "climate gap," the disproportionate impact of climate change on communities of color.<sup>xviii</sup> Research shows that low-income communities and people of color will suffer the effects of climate change at a higher proportion to other communities. For example:

- **Communities of color and low-income communities will pay an even higher proportion of their incomes on basic necessities due to climate change.** Currently, communities of color and low-income communities pay more for basic necessities including food, electricity, and water.<sup>xix</sup> A study found that households in the lowest income bracket use more than twice the proportion of their total expenditures on electricity compared to households in the highest income brackets.<sup>xx</sup> With climate change, the price of these necessities is projected to increase, and low-income people who already pay a larger share of their income on these items will most likely face disproportionately increasing economic impacts.<sup>xxi</sup>
- **Communities of color and low-income communities will suffer more during extreme heat waves.** Research shows that communities of color and low-income population more often live in areas with concrete and heat-trapping surfaces rather than areas with greater tree cover.<sup>xxii</sup> These types of physical environments create "heat islands," which exacerbate the levels of heat that low-income and communities of color experience during heat waves.<sup>xxiii</sup> Low-income communities also tend to lack access to public transportation or a car to escape the heat zones.<sup>xxiv</sup> In addition, individuals with chronic health conditions are more susceptible to the impact of heat waves.<sup>xxv</sup> Communities of color tend to have higher rates of these conditions, including cardiovascular disease, diabetes, and obesity. As a result of both the physical environment and higher rates of chronic health conditions, low-income communities of color and, particularly, African Americans in Los Angeles and Latinos in agricultural settings, are more likely to die from a heat wave compared to other residents.<sup>xxvi</sup>
- **Economic opportunities for low-income communities of color will disproportionately decrease due to climate change.** Communities of color and low-income communities also face economic ramifications with the onset of climate change. Research shows that continued climate change could produce dramatic shifts in the job sectors that employ many low-income communities, including agriculture and tourism. Latinos comprise 77% of the agricultural workforce in California. Studies suggest that climate change will impact work

in this sector. Both the frequency and intensity of weather events could lead to revenue losses or expensive adaptation measures that could result in job loss.

Most often it is not just one of these factors but all of them combined that result in detrimental impacts on communities of color and low-income communities. Therefore, a climate change lens must acknowledge and prioritize the needs of low-income communities and communities of color, who are the majority of Californians, and will be the most negatively impacted.

**Recommendation: Ensure the EGPR’s recommendation to “Build Healthy and Sustainable Communities” reflects the need to promote equitable development.**

CPEHN supports the recommendation to “Build Healthy and Sustainable Communities.” Unhealthy communities burden residents and add costs to the state as a result of health care expenses and lost days of work. Today, too many California neighborhoods fail to provide the supports necessary to promote the health of all residents. This section of the EGPR should emphasize equitable development and investments to revive distressed communities, increase mobility and access to jobs within regions, and ensure that low-income residents can access local job and health opportunities.

**Recommendation: The communities most impacted by environmental policies, especially communities of color, must be part of the stakeholder process.**

The communities that are most impacted by environmental policies and climate change are and have been working to promote environmental change at the local and state levels, including communities of color. These community leaders have developed policy recommendations that should be referenced in this report. Most importantly, communities of color should be actively engaged in the state’s vision-setting process and included in the implementation strategies.

Below are recommendations for ensuring disadvantaged communities and those most impacted by environmental, land use, and transportation decisions are included in this and other key decision-making processes:<sup>xxvii</sup>

- Provide adequate notification to potentially impacted residents about important meetings, especially those related to harmful land use projects, and ensure notifications are reader-friendly, accessible to low literacy levels, and in multiple languages that reflect the language assistance needs of the local community.
- Provide professional interpretation services at hearings.
- Ensure that meetings of decision-making bodies are held during times when residents are able to attend, such as after work hours, and in areas that are accessible via public transportation.
- Create citizen committees with real authority and review powers.
- Identify opportunities for disadvantaged communities to serve as representatives on decision-making bodies.

**Recommendation: The EGPR should encourage entrepreneurial opportunities for immigrants and communities of color in the new green economy.**

California’s multicultural communities are an essential asset to the state’s economy and environmental goals.<sup>xxviii</sup> Between 2002 and 2007, businesses owned by communities of color were the fastest growing sector of business owners in the nation, and immigrants began new businesses

at twice the rate of non-immigrants.<sup>xxix</sup> Communities of color have a long tradition of resource conservation practices and tremendous consumer purchasing power. CPEHN recommends that the EGPR include a section on how to engage these communities and others as partners in investing the state's resources, including the development of green jobs. Below are just a few recommendations on how to encourage these partnerships:<sup>xxx</sup>

- Create green vocational training programs through community colleges and K-12.
- Promote green and socially responsible entrepreneurship by:
  - Actively promoting business opportunities for minority-owned businesses through outreach and education, technical assistance, and business loans.
  - Promoting worker-owned cooperatives.
  - Funding and promoting green businesses among entrepreneurs of color.
  - Sharing micro-financing opportunities, such as through the Dolores Huerta Foundation and others.
  - Requiring environmental practices in new development and business contracts.

**Recommendation: The EGPR should identify agencies and departments that will be accountable for moving its vision, goals, and objectives forward.**

Currently, many state agencies and departments develop and implement policies to create a healthier, more environmentally safe California. However, the EGPR does not integrate an accountability role for any of these agencies or departments. CPEHN recommends utilizing the Strategic Growth Council and the Health in All Policies Task Force to establish goals, objectives, and timelines for moving the vision forward. In addition, these entities can provide assistance with monitoring and evaluating the goals.

Again, thank you for the opportunity to comment. We support many of the broad and specific goals of the report. However, we strongly urge you to better incorporate the diversity of California's population in order to better address the state's environmental goals. Please do not hesitate to contact me via email at [sdeguia@cpehn.org](mailto:sdeguia@cpehn.org) or phone at (916) 447-1299 if you have any questions.

Sincerely,



Sarah de Guia, JD  
Director of Government Affairs

---

<sup>i</sup> "2009 California Health Interview Survey." UCLA Center for Health Policy Research. March 19, 2012 <[www.chis.ucla.edu/mail/default.asp](http://www.chis.ucla.edu/mail/default.asp)>.

<sup>ii</sup> "California's Future: Population." Public Policy Institute of California by Hans Johnson. January 2014. Available at: [http://www.ppic.org/content/pubs/report/R\\_114HJ3R.pdf](http://www.ppic.org/content/pubs/report/R_114HJ3R.pdf).

<sup>iii</sup> Ibid.

<sup>iv</sup> "California's New Majority." The Greenlining Institute. 2010. Available at: [www.greenlining.org](http://www.greenlining.org).

<sup>v</sup> "California's Tomorrow: Equity is the Superior Growth Model." PolicyLink and USC Program for Environmental and Regional Equity. Available at: [www.policylink.org](http://www.policylink.org)

<sup>vi</sup> "California's New Majority." The Greenlining Institute. 2010.

<sup>vii</sup> Kim JJ, Smorodinsky S, Lipsett M, Singer BC, Hodgson AT, Ostro B. 2004. Traffic-related air pollution and respiratory health: East Bay Children's Respiratory Health Study. *American Journal of Respiratory and Critical Care Medicine* 170:520-526.  
McConnell, R. B., K. Yao, L. Jerrett, M. Lurmann, F. Gilliland, F. Kunzli, N. Gauderman, J. Avol, E. Thomas, D. Peter, J. 2006.

---

Traffic, susceptibility, and Childhood Asthma. *Environmental Health Perspectives* 114(5): 766-772. Venn AJ, Lewis SA, Cooper M, Hubbard R, Britton J. 2001. Living near a main road and the risk of wheezing illness in children. *American Journal of Respiratory and Critical Care Medicine* 164(12): 2177-2180.

<sup>viii</sup> Cohen DA, et. al., 2006. Public parks and physical activity among adolescent girls. *Pediatrics* 118:1381-1389. Humpel N, Owen N, Leslie E. 2002. Environmental factors associated with adults participation in physical activity: A review. *American Journal of Preventive Medicine* 22(3):188-199.

<sup>ix</sup> Drewnowski A, Darmon N, Briend A. 2004. Replacing fats and sweets with vegetables and fruits – a question of cost. *American Journal of Public Health* 94(9):1555-1559. Basiotis PP. 1992. Validity of the self-reported food sufficiency status item in the U.S. In Haldeman, VA. Paper presented at the American Council on Consumer Interests 38th Annual Conference. US Dept of Agriculture. Columbia, MO.

<sup>x</sup> Handy, S. 1996 Understanding the link between urban form and non-work traveling behavior. *Journal of Planning Education and Research*. 15:183-98.

<sup>xi</sup> “The Landscape of Opportunity: Cultivating Health Equity in California.” California Pan-Ethnic Health Network. June 2012. Available at [www.cpehn.org](http://www.cpehn.org).

<sup>xii</sup> “The Green Paper, A community vision for Environmentally and Economically Sustainable Development.” The Center on Race, Poverty, and the Environment. Jan. 2011. Accessed: [www.cpre-ej.org](http://www.cpre-ej.org).

<sup>xiii</sup> “The Landscape of Opportunity: Cultivating Health Equity in California.” California Pan-Ethnic Health Network. June 2012. Available at: [www.cpehn.org](http://www.cpehn.org).

<sup>xiv</sup> Ibid.

<sup>xv</sup> Ibid.

<sup>xvi</sup> Ibid.

<sup>xvii</sup> Ibid.

<sup>xviii</sup> “The Climate Gap: Inequalities in How Climate Change Hurts Americans and How to Close the Gap.” by Rachel Morello-Frosch, P.h.D., MPH, Manuel Pastor, P.h.D, James Sadd, P.h.D, Seth B. Shonkoff, MPH. Accessed April 29, 2014 at: [http://dornsife.usc.edu/assets/sites/242/docs/The\\_Climate\\_Gap\\_Full\\_Report\\_FINAL.pdf](http://dornsife.usc.edu/assets/sites/242/docs/The_Climate_Gap_Full_Report_FINAL.pdf)

<sup>xix</sup> Ibid.

<sup>xx</sup> Ibid.

<sup>xxi</sup> Ibid.

<sup>xxii</sup> Ibid.

<sup>xxiii</sup> Ibid.

<sup>xxiv</sup> Ibid.

<sup>xxv</sup> Ibid.

<sup>xxvi</sup> Ibid.

<sup>xxvii</sup> All of the recommendations are included in “The Green Paper,” Center on Race, Poverty, and the Environment. 2011.

<sup>xxviii</sup> “California’s Tomorrow.” PolicyLink and USC.

<sup>xxix</sup> Ibid.

<sup>xxx</sup> All of the recommendations are included in “The Green Paper,” Center on Race, Poverty, and the Environment. 2011.