



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-1000

This Worksheet was designed to be used by those “Partners” (including Public Housing Authorities, consultants, contractors, and nonprofits) who assist Responsible Entities and HUD in preparing environmental reviews, but legally cannot take full responsibilities for these reviews themselves. Responsible Entities and HUD should use the RE/HUD version of the Worksheet.

Environmental Justice (CEST and EA) – PARTNER

<https://www.hudexchange.info/environmental-review/environmental-justice>

HUD strongly encourages starting the Environmental Justice analysis only after all other laws and authorities, including Environmental Assessment factors if necessary, have been completed.

1. Were any adverse environmental impacts identified in any other compliance review portion of this project’s total environmental review?

Yes → *Continue to Question 2.*

No → *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

2. Were these adverse environmental impacts disproportionately high for low-income and/or minority communities?

Yes

Explain:

[Click here to enter text.](#)

→ *The RE/HUD must work with the affected low-income or minority community to decide what mitigation actions, if any, will be taken. Provide any supporting documentation.*

No

Explain:

[Click here to enter text.](#)

→ *If the RE/HUD agrees with this recommendation, the review is in compliance with this section. Continue to the Worksheet Summary below.*

Worksheet Summary

Provide a full description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers
- Any additional requirements specific to your program or region

Include all documentation supporting your findings in your submission to HUD.

The US EPA EJSscreen is an on-line tool that evaluates a wide range of environmental and social factors. Environmental factors focus on air pollution, underground tanks and hazardous material sites, and

building concerns such as lead paint. Social factors include income, skin color, language, education, and age (very young and seniors). The purpose of the tool is to identify communities that are subjected to high levels of pollution and avoid or mitigate development that may worsen health or economic outcomes.

The Project is about 3 miles northwest of US Hwy 80, and 2,000 feet west of SR 113. Covell Boulevard is the primary local street. These are all local sources of air pollution such as PM2.5. Three EJScreen model runs were performed to estimate if the apartment construction would disproportionately impact vulnerable populations. Reports for these model runs are included below.

EJScreen model runs are typically performed for the immediate project site area and then at increasing distances in concentric circles. This allows for comparison between the project site and near-by areas. The model was updated to V2.1 in October 2022 to enhance capabilities in some US Territories and expand EJ metrics. The model now considers five factors (two previously) to calculate a “Demographic Index”. The factors considered are percent low-income, percent limited English-speaking, percent less than high school education, percent unemployed, and low life expectancy. (Source: <https://www.epa.gov/newsreleases/epa-launches-updates-environmental-justice-mapping-tool-ejscreen>)

The Demographic Index is calculated for a circle with the Bretton Woods project as the center point. The values are expressed as a percentile of the state average for each distance is as follows:

0.25 miles, with a population of about 425 people, the Demographic Index is 37%,
0.5 miles, with a population of about 2868, the Demographic Index is 47, and
1 mile, with a population of about 17,063, the Demographic Index is 47.

There is a roughly 20% difference between the quarter-mile circle and the one-mile circle. This is probably because the existing population within the quarter-mile circle is relatively uniform, compared to the much larger population captured in the one-mile circle.

EPA recommends considering pollution scores for various metrics that are over the 80th state percentile. The entire area shows scores below the 80th percentile. Therefore, the proposed project would not pose any adverse environmental impacts.

.25 miles Ring Centered at 38.562589,-121.775287, CALIFORNIA, EPA Region 9

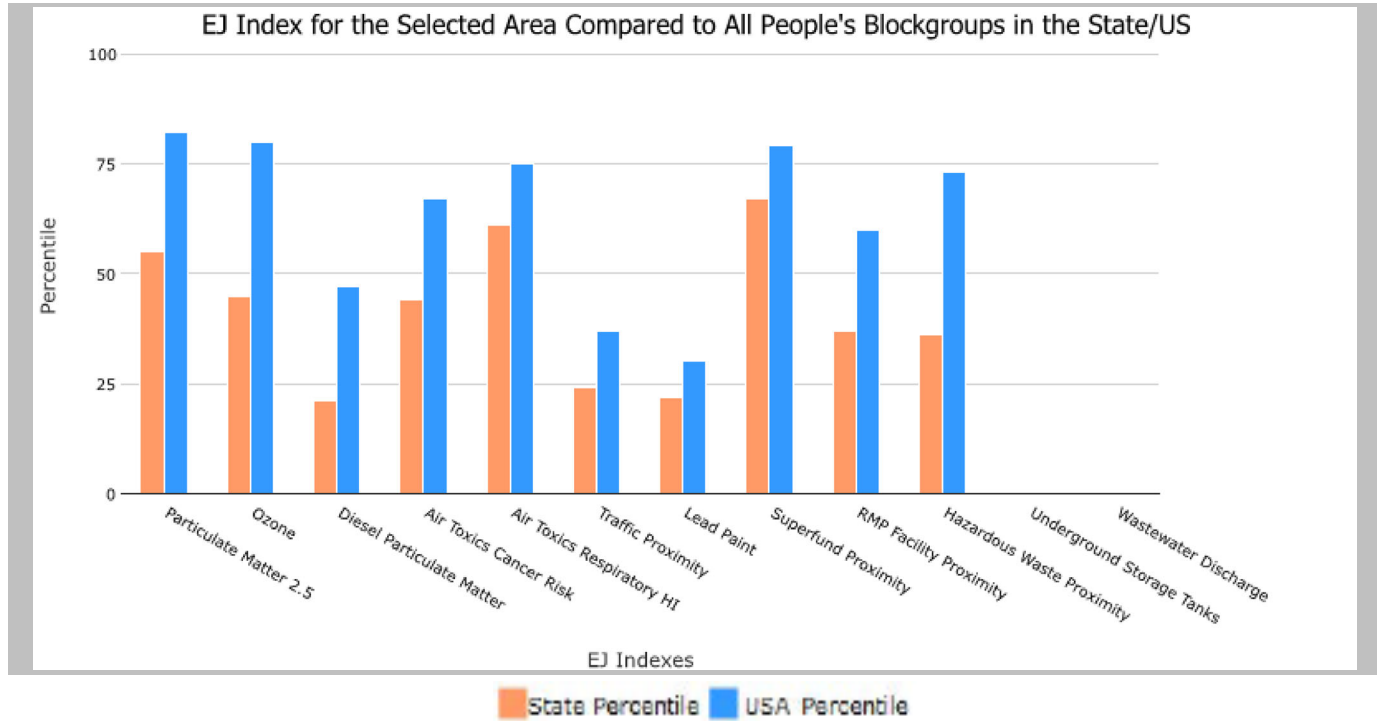
Approximate Population: 425

Input Area (sq. miles): 0.20

Bretton Woods - Mercy Housing

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
Particulate Matter 2.5 EJ index	55	82
Ozone EJ index	45	80
Diesel Particulate Matter EJ index*	21	47
Air Toxics Cancer Risk EJ index*	44	67
Air Toxics Respiratory HI EJ index*	61	75
Traffic Proximity EJ index	24	37
Lead Paint EJ index	22	30
Superfund Proximity EJ index	67	79
RMP Facility Proximity EJ index	37	60
Hazardous Waste Proximity EJ index	36	73
Underground Storage Tanks EJ index	0	0
Wastewater Discharge EJ index	0	0

EJ Indexes - The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.



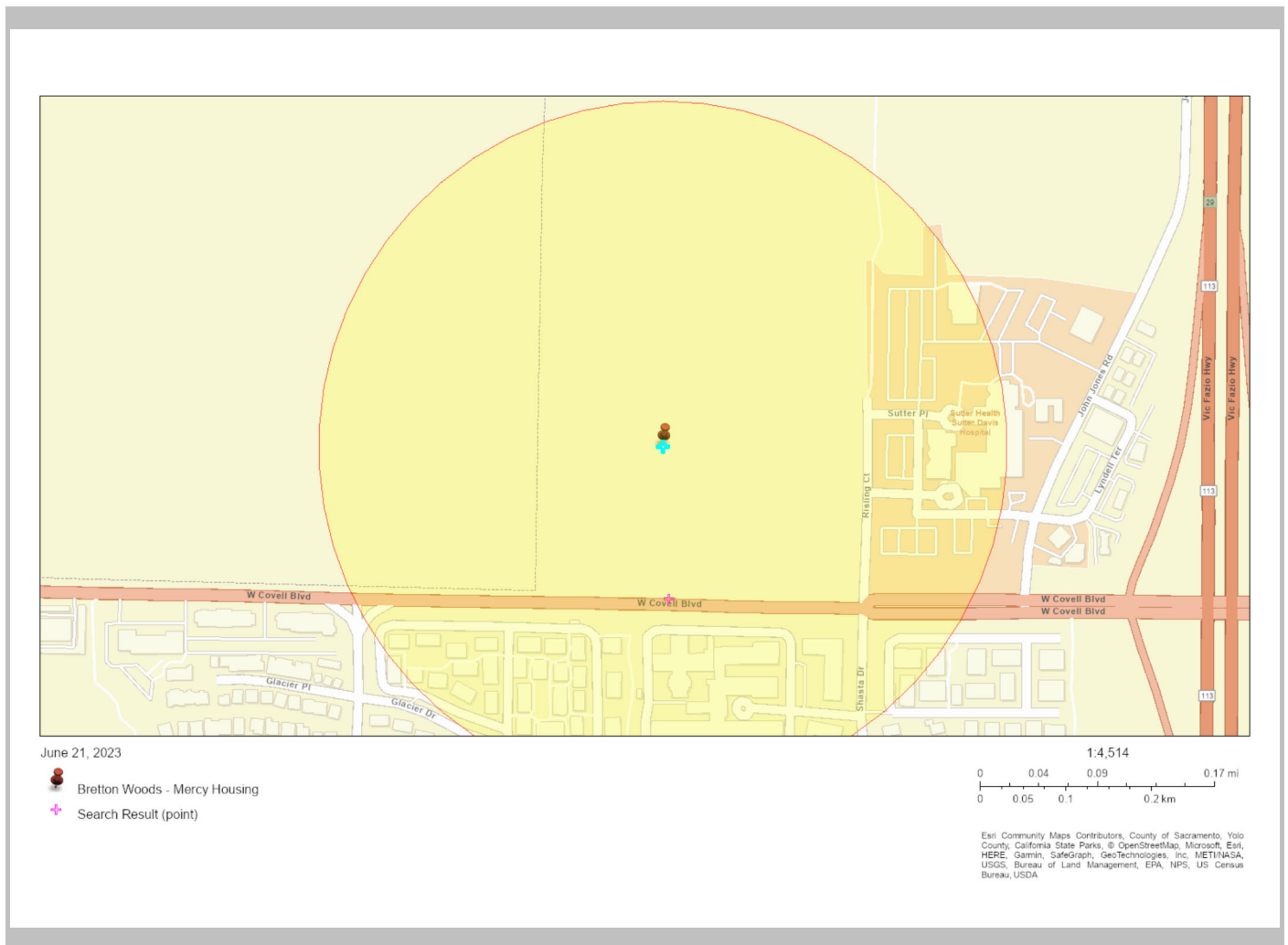
*Diesel particular matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

.25 miles Ring Centered at 38.562589,-121.775287, CALIFORNIA, EPA Region 9

Approximate Population: 425

Input Area (sq. miles): 0.20

Bretton Woods - Mercy Housing



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	0

EJScreen Report (Version 2.11)

.25 miles Ring Centered at 38.562589,-121.775287, CALIFORNIA, EPA Region 9

Approximate Population: 425

Input Area (sq. miles): 0.20

Bretton Woods - Mercy Housing

Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	12.4	11.7	58	8.67	95
Ozone (ppb)	45.6	47.7	45	42.5	80
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.156	0.33	17	0.294	<50th
Air Toxics Cancer Risk* (lifetime risk per million)	30	31	76	28	80-90th
Air Toxics Respiratory HI*	0.5	0.43	92	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	43	1400	21	760	22
Lead Paint (% Pre-1960 Housing)	0.014	0.28	17	0.27	16
Superfund Proximity (site count/km distance)	0.2	0.17	83	0.13	86
RMP Facility Proximity (facility count/km distance)	0.3	1.1	35	0.77	48
Hazardous Waste Proximity (facility count/km distance)	2.3	5.2	34	2.2	73
Underground Storage Tanks (count/km ²)	0	1.5	0	3.9	0
Wastewater Discharge (toxicity-weighted concentration/m distance)	0	67	0	12	0
Socioeconomic Indicators					
Demographic Index	37%	44%	39	35%	60
Supplemental Demographic Index	12%	15%	46	15%	48
People of Color	43%	63%	30	40%	61
Low Income	31%	29%	60	30%	55
Unemployment Rate	4%	6%	44	5%	52
Limited English Speaking Households	8%	9%	60	5%	81
Less Than High School Education	3%	16%	21	12%	23
Under Age 5	2%	6%	16	6%	18
Over Age 64	28%	14%	89	16%	86
Low Life Expectancy	16%	18%	35	20%	20

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.25 miles Ring Centered at 38.562589,-121.775287, CALIFORNIA, EPA Region 9

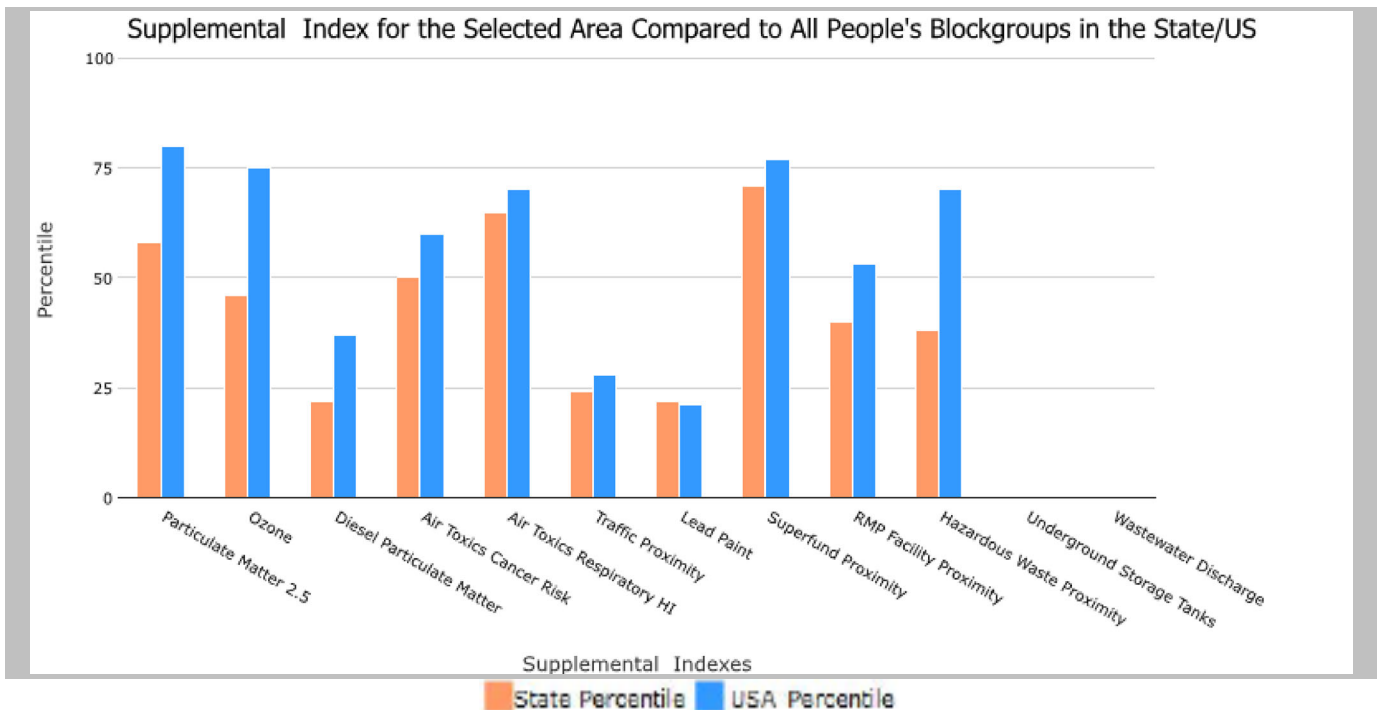
Approximate Population: 425

Input Area (sq. miles): 0.20

Bretton Woods - Mercy Housing

Selected Variables	State Percentile	USA Percentile
Supplemental Indexes		
Particulate Matter 2.5 Supplemental Index	58	80
Ozone Supplemental Index	46	75
Diesel Particulate Matter Supplemental Index*	22	37
Air Toxics Cancer Risk Supplemental Index*	50	60
Air Toxics Respiratory HI Supplemental Index*	65	70
Traffic Proximity Supplemental Index	24	28
Lead Paint Supplemental Index	22	21
Superfund Proximity Supplemental Index	71	77
RMP Facility Proximity Supplemental Index	40	53
Hazardous Waste Proximity Supplemental Index	38	70
Underground Storage Tanks Supplemental Index	0	0
Wastewater Discharge Supplemental Index	0	0

Supplemental Indexes - The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on low-income, limited English speaking, less than high school education, unemployed, and low life expectancy populations with a single environmental indicator.



This report shows the values for environmental and demographic indicators, EJScreen indexes, and supplemental indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports. For additional information, see: www.epa.gov/environmentaljustice.

EJScreen Report (Version 2.11)



.5 miles Ring Centered at 38.562589,-121.775287, CALIFORNIA, EPA Region 9

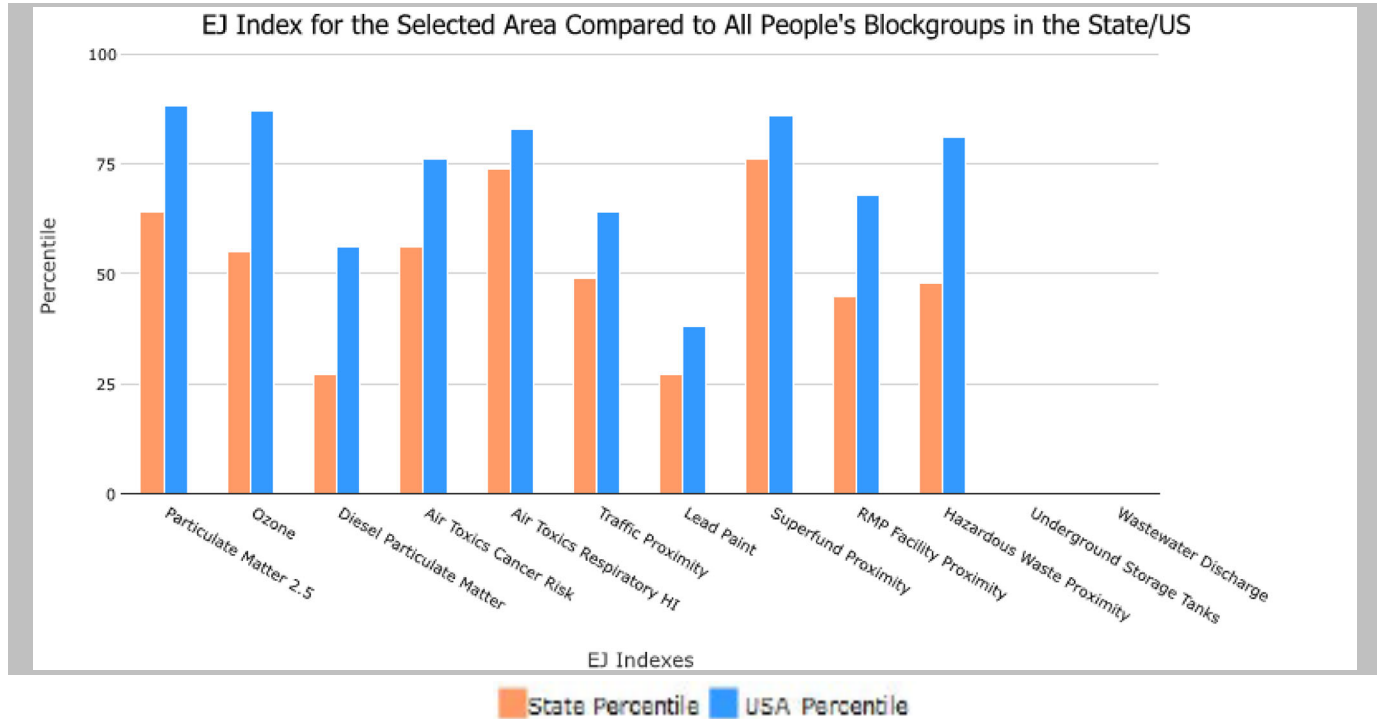
Approximate Population: 2,868

Input Area (sq. miles): 0.79

Bretton Woods - Mercy Housing

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
Particulate Matter 2.5 EJ index	64	88
Ozone EJ index	55	87
Diesel Particulate Matter EJ index*	27	56
Air Toxics Cancer Risk EJ index*	56	76
Air Toxics Respiratory HI EJ index*	74	83
Traffic Proximity EJ index	49	64
Lead Paint EJ index	27	38
Superfund Proximity EJ index	76	86
RMP Facility Proximity EJ index	45	68
Hazardous Waste Proximity EJ index	48	81
Underground Storage Tanks EJ index	0	0
Wastewater Discharge EJ index	0	0

EJ Indexes - The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people of color populations with a single environmental indicator.



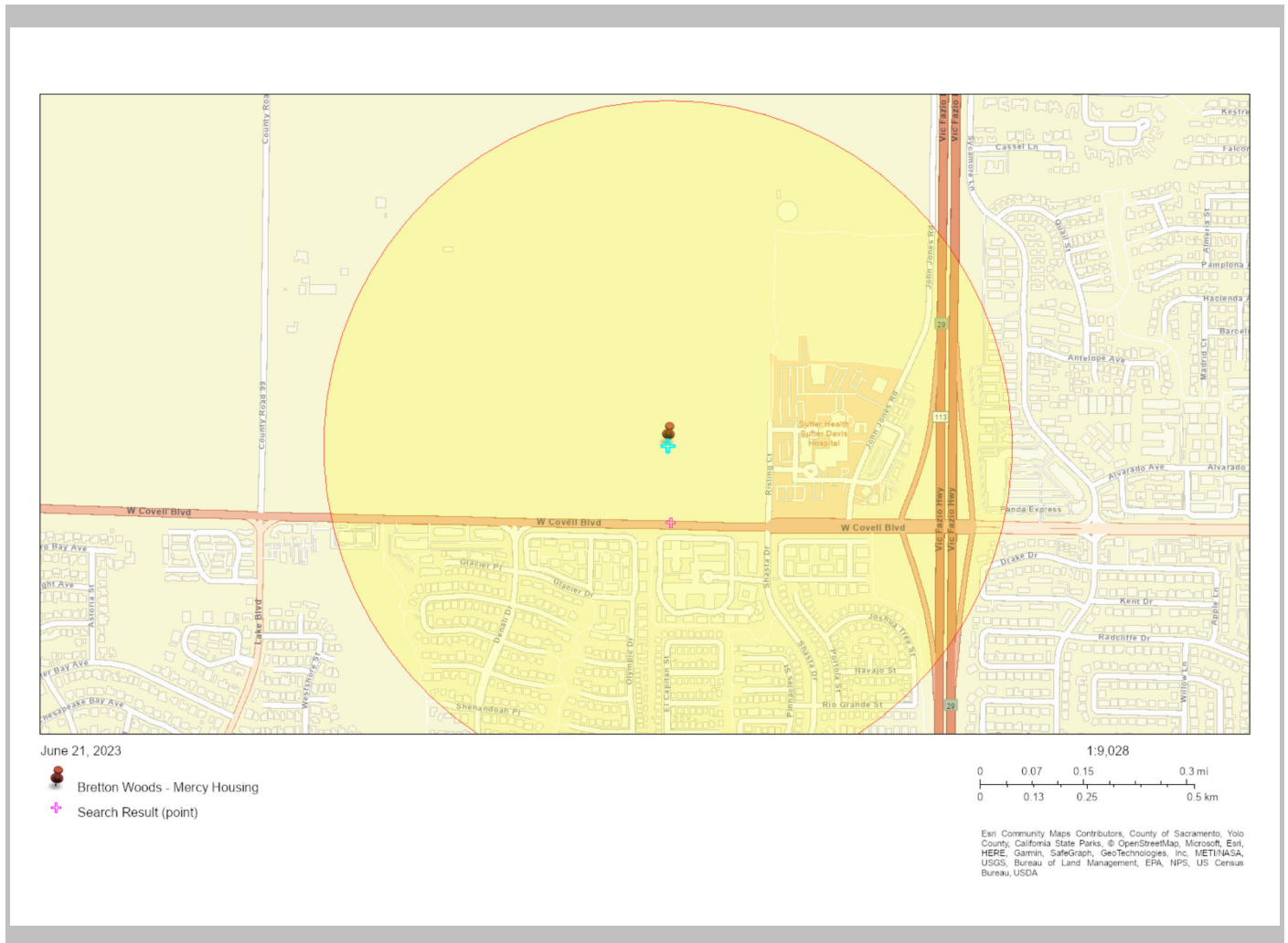
*Diesel particular matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/haps/air-toxics-data-update>.

.5 miles Ring Centered at 38.562589,-121.775287, CALIFORNIA, EPA Region 9

Approximate Population: 2,868

Input Area (sq. miles): 0.79

Bretton Woods - Mercy Housing



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	1

EJScreen Report (Version 2.11)

.5 miles Ring Centered at 38.562589,-121.775287, CALIFORNIA, EPA Region 9

Approximate Population: 2,868

Input Area (sq. miles): 0.79

Bretton Woods - Mercy Housing

Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	12.4	11.7	59	8.67	95
Ozone (ppb)	45.7	47.7	45	42.5	81
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.162	0.33	18	0.294	<50th
Air Toxics Cancer Risk* (lifetime risk per million)	30	31	76	28	80-90th
Air Toxics Respiratory HI*	0.5	0.43	92	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	240	1400	44	760	50
Lead Paint (% Pre-1960 Housing)	0.021	0.28	19	0.27	19
Superfund Proximity (site count/km distance)	0.2	0.17	83	0.13	86
RMP Facility Proximity (facility count/km distance)	0.3	1.1	35	0.77	49
Hazardous Waste Proximity (facility count/km distance)	2.7	5.2	38	2.2	76
Underground Storage Tanks (count/km ²)	0	1.5	0	3.9	0
Wastewater Discharge (toxicity-weighted concentration/m distance)	4.2E-09	67	0	12	1
Socioeconomic Indicators					
Demographic Index	47%	44%	55	35%	71
Supplemental Demographic Index	16%	15%	59	15%	63
People of Color	46%	63%	34	40%	64
Low Income	47%	29%	80	30%	77
Unemployment Rate	6%	6%	61	5%	67
Limited English Speaking Households	7%	9%	58	5%	80
Less Than High School Education	3%	16%	20	12%	23
Under Age 5	1%	6%	12	6%	14
Over Age 64	21%	14%	77	16%	72
Low Life Expectancy	15%	18%	18	20%	9

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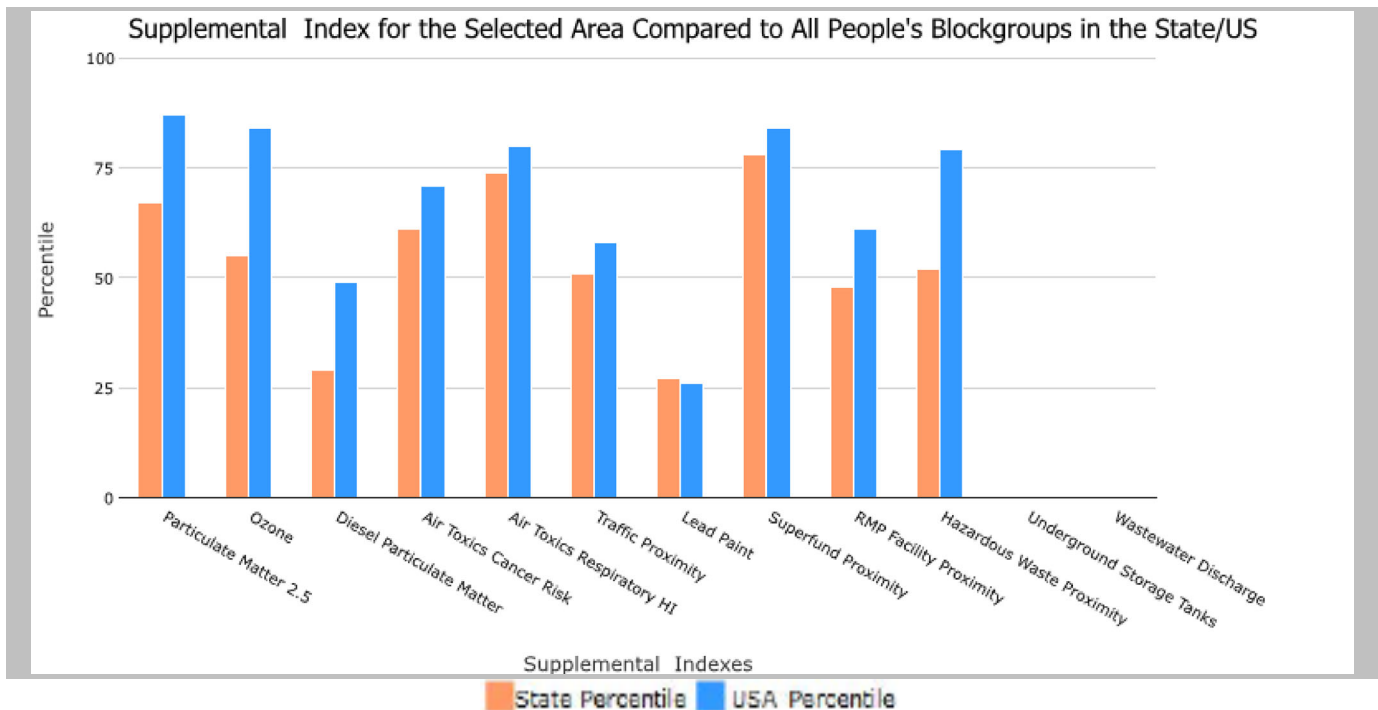
Approximate Population: 2,868

Input Area (sq. miles): 0.79

Bretton Woods - Mercy Housing

Selected Variables	State Percentile	USA Percentile
Supplemental Indexes		
Particulate Matter 2.5 Supplemental Index	67	87
Ozone Supplemental Index	55	84
Diesel Particulate Matter Supplemental Index*	29	49
Air Toxics Cancer Risk Supplemental Index*	61	71
Air Toxics Respiratory HI Supplemental Index*	74	80
Traffic Proximity Supplemental Index	51	58
Lead Paint Supplemental Index	27	26
Superfund Proximity Supplemental Index	78	84
RMP Facility Proximity Supplemental Index	48	61
Hazardous Waste Proximity Supplemental Index	52	79
Underground Storage Tanks Supplemental Index	0	0
Wastewater Discharge Supplemental Index	0	0

Supplemental Indexes - The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on low-income, limited English speaking, less than high school education, unemployed, and low life expectancy populations with a single environmental indicator.



This report shows the values for environmental and demographic indicators, EJScreen indexes, and supplemental indexes. It shows environmental and demographic raw data (e.g., the estimated concentration of ozone in the air), and also shows what percentile each raw data value represents. These percentiles provide perspective on how the selected block group or buffer area compares to the entire state, EPA region, or nation. For example, if a given location is at the 95th percentile nationwide, this means that only 5 percent of the US population has a higher block group value than the average person in the location being analyzed. The years for which the data are available, and the methods used, vary across these indicators. Important caveats and uncertainties apply to this screening-level information, so it is essential to understand the limitations on appropriate interpretations and applications of these indicators. Please see EJScreen documentation for discussion of these issues before using reports. For additional information, see: www.epa.gov/environmentaljustice.

1 mile Ring Centered at 38.562589,-121.775287, CALIFORNIA, EPA Region 9

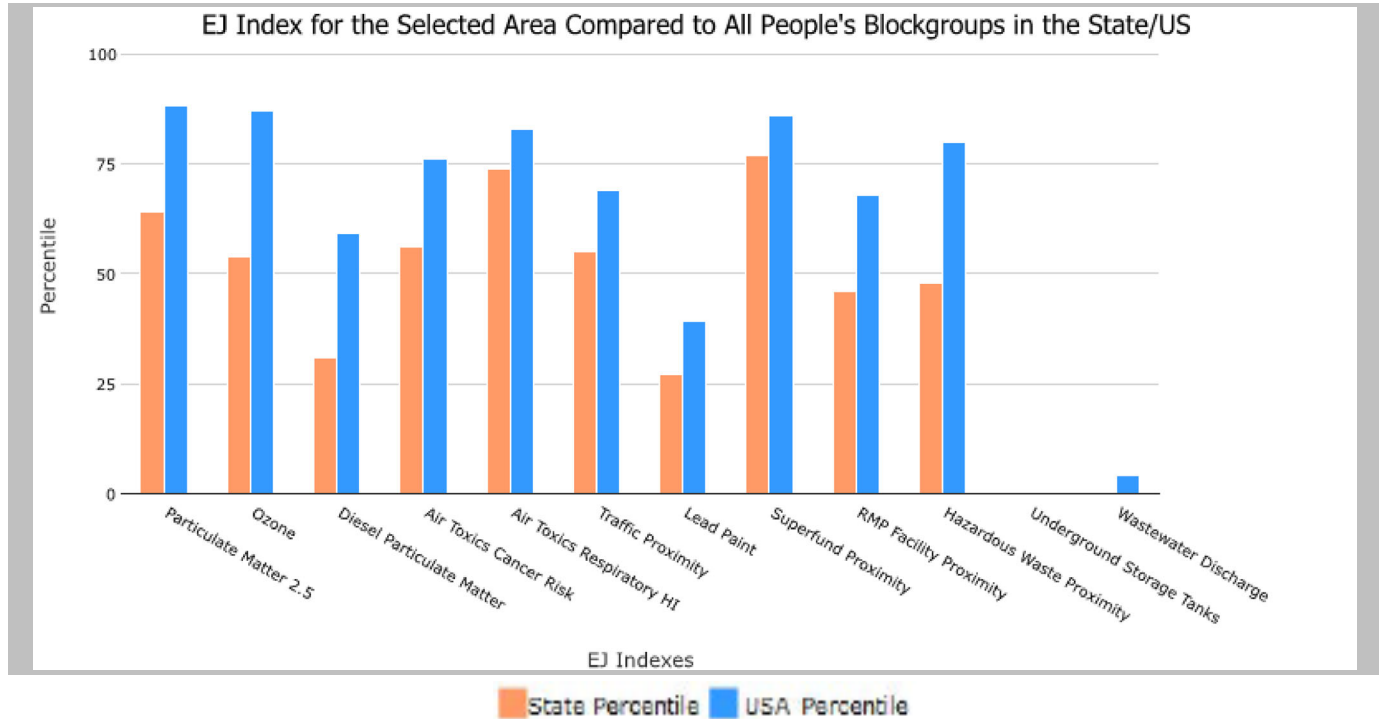
Approximate Population: 17,063

Input Area (sq. miles): 3.14

Bretton Woods - Mercy Housing

Selected Variables	State Percentile	USA Percentile
Environmental Justice Indexes		
Particulate Matter 2.5 EJ index	64	88
Ozone EJ index	54	87
Diesel Particulate Matter EJ index*	31	59
Air Toxics Cancer Risk EJ index*	56	76
Air Toxics Respiratory HI EJ index*	74	83
Traffic Proximity EJ index	55	69
Lead Paint EJ index	27	39
Superfund Proximity EJ index	77	86
RMP Facility Proximity EJ index	46	68
Hazardous Waste Proximity EJ index	48	80
Underground Storage Tanks EJ index	0	0
Wastewater Discharge EJ index	0	4

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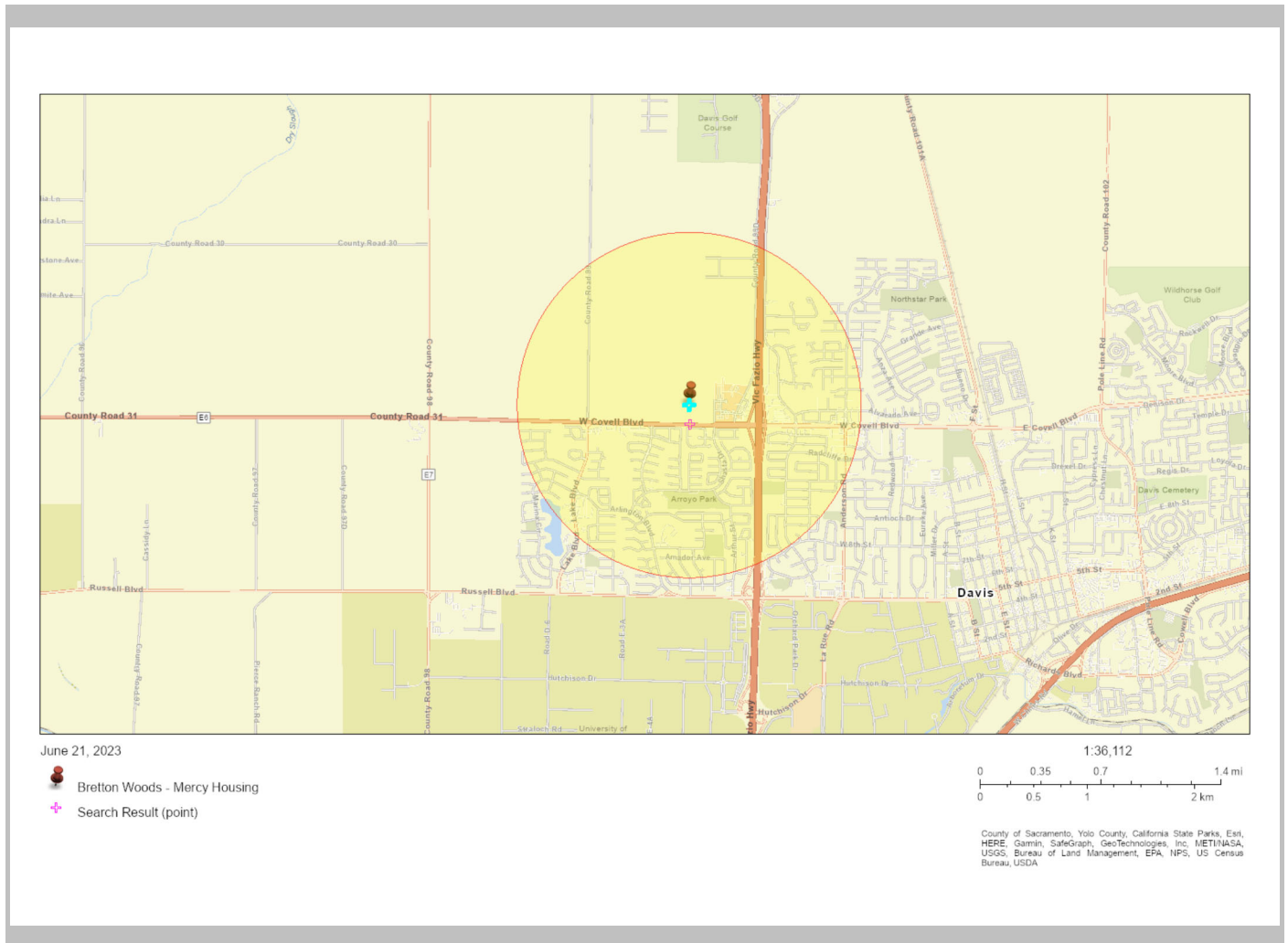
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Approximate Population: 17,063

Input Area (sq. miles): 3.14

Bretton Woods - Mercy Housing



Sites reporting to EPA	
Superfund NPL	0
Hazardous Waste Treatment, Storage, and Disposal Facilities (TSDF)	1

EJScreen Report (Version 2.11)



1 mile Ring Centered at 38.562589,-121.775287, CALIFORNIA, EPA Region 9

Approximate Population: 17,063

Input Area (sq. miles): 3.14

Bretton Woods - Mercy Housing

Selected Variables	Value	State Avg.	%ile in State	USA Avg.	%ile in USA
Pollution and Sources					
Particulate Matter 2.5 ($\mu\text{g}/\text{m}^3$)	12.4	11.7	60	8.67	95
Ozone (ppb)	45.7	47.7	45	42.5	81
Diesel Particulate Matter* ($\mu\text{g}/\text{m}^3$)	0.173	0.33	20	0.294	<50th
Air Toxics Cancer Risk* (lifetime risk per million)	30	31	76	28	80-90th
Air Toxics Respiratory HI*	0.5	0.43	92	0.36	95-100th
Traffic Proximity (daily traffic count/distance to road)	400	1400	53	760	62
Lead Paint (% Pre-1960 Housing)	0.047	0.28	26	0.27	25
Superfund Proximity (site count/km distance)	0.22	0.17	85	0.13	87
RMP Facility Proximity (facility count/km distance)	0.32	1.1	37	0.77	50
Hazardous Waste Proximity (facility count/km distance)	2.6	5.2	38	2.2	76
Underground Storage Tanks (count/km ²)	7.7E-05	1.5	0	3.9	0
Wastewater Discharge (toxicity-weighted concentration/m distance)	4E-07	67	2	12	6
Socioeconomic Indicators					
Demographic Index	47%	44%	55	35%	71
Supplemental Demographic Index	15%	15%	55	15%	59
People of Color	48%	63%	35	40%	65
Low Income	46%	29%	78	30%	75
Unemployment Rate	8%	6%	70	5%	74
Limited English Speaking Households	4%	9%	43	5%	70
Less Than High School Education	2%	16%	13	12%	15
Under Age 5	3%	6%	24	6%	26
Over Age 64	16%	14%	60	16%	52
Low Life Expectancy	11%	18%	2	20%	1

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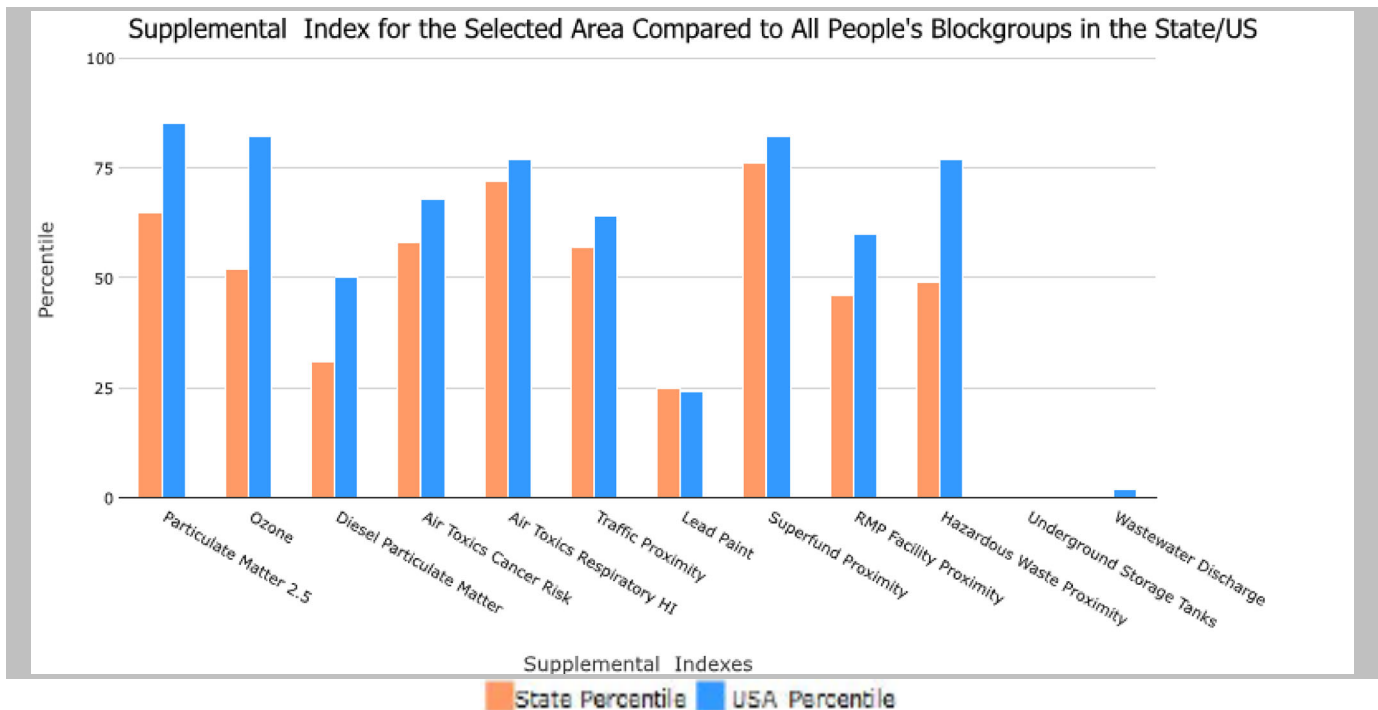
Approximate Population: 17,063

Input Area (sq. miles): 3.14

Bretton Woods - Mercy Housing

Selected Variables	State Percentile	USA Percentile
Supplemental Indexes		
Particulate Matter 2.5 Supplemental Index	65	85
Ozone Supplemental Index	52	82
Diesel Particulate Matter Supplemental Index*	31	50
Air Toxics Cancer Risk Supplemental Index*	58	68
Air Toxics Respiratory HI Supplemental Index*	72	77
Traffic Proximity Supplemental Index	57	64
Lead Paint Supplemental Index	25	24
Superfund Proximity Supplemental Index	76	82
RMP Facility Proximity Supplemental Index	46	60
Hazardous Waste Proximity Supplemental Index	49	77
Underground Storage Tanks Supplemental Index	0	0
Wastewater Discharge Supplemental Index	0	2

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