

Business and Industry Workshop on the Draft California Communities Environmental Health Screening Tool (CalEnviroScreen)

Monday, October 1, 2012

Sierra Hearing Room, Cal/EPA Headquarters Building, Sacramento, California 94814

The seventh workshop in Sacramento focused on how the CalEnviroScreen tool might be useful to businesses and industry. It attracted a group of about 25 participants that included business men and women and a few government representatives. Representatives from the California Farm Bureau, Pacific Gas & Electric, and the California Council for Environmental and Economic Balance were in attendance, as well as representatives from the American Lung Association, the California Black Chamber of Commerce, and the California League of Food Processors. From the government, representatives from the Department of Pesticide Regulation, the Water Resources Control Board, and from the Governor's office were also in attendance.

Staff sought comments and suggestions related to the overall approach taken and specifically on proposed indicators, data sources, and the methodology. Numerous comments were made at the workshop and are grouped and described below. Comments made more than once were consolidated and placed in the most appropriate category.

Methods/General:

- What other indicators are possible? There is a lot unknown right now so it's hard to comment--need more understanding of method and then another opportunity to comment
- This is a complicated analysis and more time should be taken to make sure it's done accurately
- Not enough time to get word out about the workshops and the workshop period did not feel like enough time for an actual public analysis
- Before final document comes out, want to see drinking water added as an indicator and see other necessary changes made
- This assumes health disparities are a result of environmental exposures—how does methodology eliminate other causes for such disparities? Need evidence showing that these are truly good indicators of environmental exposure

Geographic Scale:

- ZIP code level is too blunt
- Using county level health data is too big

Exposures:

- This analysis is incorrectly stating that every time a pesticide is used, it is equivalent to 100% exposure. The pesticides selected for analysis are heavily regulated already to minimize exposure. Should look at Department of Pesticide Regulation's Air Monitoring Network data
- Toxic release and traffic data also being misused—can't equate this data to exposure

Public Health Effects:

- If this component is moved to sensitive populations, would asthma prevalence be considered instead of ER visits?
- Should consider impacts of various forms of stress on the community

Environmental Effects:

- Should add in 'corrective action' facilities
- Should consider enforcement actions and areas that lack enforcement

Socioeconomic Factors and Sensitive Populations:

- Should consider unemployment
- Should consider crime data
- Should consider drug activity, drug labs

Use of Tool:

- Want to make sure that the tool does not impose additional permitting requirements like SB 375
- If tool is used for additional mitigation in California Environmental Quality Act (CEQA), it could burden identified communities and would be a roadblock for investment
- Want clear statement in document that this tool is not to be used for regulatory purposes like CEQA, fine if used for incentive programs. Mixed messages in memo as to whether this could be used in regulation
- Concern that the tool will be used to identify areas where additional mitigation is required, may redline communities
- Feel that CEQA has failed communities, more needs to be done
- Tool should be designed with uses in mind, but currently uses are not clearly defined

- If this is too blunt an instrument, uncertainty on a business's impact may dissuade businesses from putting a facility in communities that could benefit from it
- Many food processors are located in poor, rural areas—concern about redlining in these communities that already have many economic and regulatory stressors
- Tool should be used to enhance economic vitality
- Should work with regional water quality control boards to improve water quality
- Could be used to provide incentives going into education of the workforce
- Some people may not understand the drivers for a high score—could be vulnerability more than pollution exposure
- Screening is not an assessment and there may be unintended consequences from a tool like this unless Cal/EPA is very clear about intended uses for the tool and what it is showing
- Concern that once the tool is out in public there will be uncontrollable consequences—clearly defining use won't control that. Is there a way these things can be controlled?
- Use to create investment incentives that may decrease vulnerabilities so that investors can be sure their investments are safe
- Prefer that the tool be called a 'toolkit' or 'toolbox'—in main report could stop after identifying components and indicators and then in an appendix could show how to combine particular indicators for specific purposes