



**Building  
Industry  
Association  
of Southern  
California, Inc.**

17744 Sky Park Circle, Suite 170  
Irvine, California 92614  
949.553.9500  
fax: 949.769.8943  
<http://www.biasc.org>

February 1, 2013

Secretary Matthew Rodriguez  
Secretary for Environmental Protection, Cal/EPA  
1001 I Street  
Sacramento, CA 95814

**SUBJECT: Second Public Review Draft of the California Communities  
Environmental Health Screening Tool (CalEnviroScreen)**

Dear Secretary Rodriguez:

Building Industry Association of Southern California, Inc. (BIASC) is a regional trade association that represents more than 1,000 member companies within a six county region. Together, BIASC's members build most of the homes and communities throughout the same six-county region.

BIASC participated in the December 12, 2012 Cal EPA Workshop and review of the first draft of the CalEnviroScreen Environmental Health Tool at the SCAG offices in Los Angeles. We offered verbal comments to Office of Environmental Health Hazard Assessment staff conducting the meeting. Our primary concerns with CalEnviroScreen can be summarized into three general categories, "Big Picture", "Unintended Consequences or Misuse" and Technical/Methodology Concerns.

**Big Picture:**

The development of this tool and in particular the generation of the maps demonstrating the scoring outcomes will eventually be made available for public consumption. This by definition will create an environmental "redline" of California communities. The stated purpose of CalEnviroScreen is to "screen the environmental health of California's communities using existing environmental, health and socio-economic data to compare the cumulative impacts of environmental pollution on the state's communities." This analysis is presumably to help Cal EPA target its regulatory and grant funding efforts more efficiently. This stated purpose is largely an internal agency functional objective.

Baldy View Chapter  
L.A./Ventura Chapter  
Orange County Chapter  
Riverside County Chapter

In practice what the dissemination of this data and maps will do is create a stigma for California communities which are determined to have high environmental impact scores. High scores will make these communities less attractive to potential private investment and development opportunities. Redlining typically has the effect of higher cost of business in the form of insurance rates and finance. Additionally, this stigma of “unhealthy communities” will affect consumer demand for housing in these impacted areas. Many “Best Places to live” scoring databases already apply an environmental score based primarily in air quality scores compiled from US EPA public data. If made publically available, the proposed CalEnviroScreen tool results will not help promote California communities in a positive light and will instead create a potentially unrealistic representation of the environmental and living conditions within California communities.

**Misuse:**

BIASC acknowledges the precautionary language added by OEHHA regarding the intended use and limitations of the CalEnviroScreen tool which is included in the current draft. Clarification that the tool is not intended to serve as a CEQA supplement or substitute for more detailed project specific analysis is helpful, but does not preclude the unintended misuse of the tool. BIASC recommends a strong disclaimer be provided to the local jurisdictions that would use this tool for planning purposes.

Also, if made available for public consumption, the data will become a political tool by special interest groups to advance their agendas and unduly burden development and investment into many California communities, thus hurting the communities they want to protect.

**Technical/Methodology Concerns:**

The applied statistical methodology of using a multiplier to draw correlation between socio-economic characteristics with specific chemical exposure burdens, is not a sound approach to determining actual risk to public health. While it is a common academic approach, the complexities of individual community variables such as geography; topography; prevailing winds; and altitude make a one size fit-all tool approach unrealistic.

BIASC understands the goals of Cal EPA CalEnviroScreen as stated, but suggests that the data compilation and mapping would best serve the communities of California by utilization as an internal agency and local government planning tool and not be publically disseminated. We encourage the limited and exclusive use of

Building Industry Association of Southern California

February 1, 2013

Page 3

the CalEnviroScreen Tool for internal planning purposes only. At a time when California's economy is already extremely fragile, this tool risks stigmatizing California communities and will not help promote badly needed private investment in the state.

Please contact me at (949)-553-9500 #126 if you have any questions regarding our concerns or comments. Thank you for the opportunity to comment and your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "David W. Shepherd", with a large, sweeping flourish at the end.

David W. Shepherd,  
Chief Executive Officer  
Building Industry Association of Southern California