



June 2, 2014

CalEnviroScreen
c/o John Faust, Chief, Community Assessment & Research Section
Office of Environmental Health Hazard Assessment
1515 Clay Street, Suite 1600
Oakland, CA 94612

Dear Mr. Faust,

Thank you for providing Clean Water Action with this opportunity to make comment on CalEnviroScreen, version 2.0 on behalf of our approximately 50,000 California members. We support the recommendations in the letter submitted by the California Environmental Justice Alliance. Given our specific focus on and expertise in water, however, we would like to take this opportunity highlight two specific areas related to water quality in our comments.

Drinking Water Impacts

Part of our organization's central mission is to ensure that all people have access to safe, clean, and affordable water. To accomplish this fundamental goal, we work to ensure that we accurately and adequately assess water quality in communities that bear heavy burdens of environmental contamination and the potential routes of exposure and health impacts on those communities. This then leads to efforts to address water impairments through both pollution prevention at the source and remediation of current contamination. For these reasons, Clean Water Action applauds the addition of the drinking water indicator and fully supports basing the assessment of impacts of drinking water contaminants on the Public Health Goals (PHGs) established by the Office of Environmental Health Hazard Assessment (OEHHA).

PHGs are *the* measurements of health risk related to drinking water, being the level at which, based on current science, no significant adverse public health impacts would be expected during the average lifetime [Health & Safety Code §116365(c)]. This is quite different than the legal standard or Maximum Contaminant Level, which considers the health risks, but is also based on technical feasibility at the time the standard is set and costs to attain the standard. Consequently, though California strives to set its legal standards as close to the PHG as possible, they are not always reflective of what is optimally "safe". For CalEnviroScreen to provide the best data on the effects of drinking water quality on local communities, it must use the measurement tool that is solely indicative of health risk.

Impaired surface water and subsistence fishing

Clean Water Action is deeply concerned about one potential environmental route of public exposure that is discussed but not explicitly included in the environmental indicators used in version 2.0. For years we have advocated for greater research on and actions to prevent exposure to water contaminants by subsistence fishers who consume high levels of locally caught fish from polluted waters. Subsistence fishing can have a direct correlation to both the economics of a community and the

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cultural makeup of the local population; people often fish out of financial necessity in order to feed their families or have traditional ties to fishing and other uses of local waters. Such understanding would address a potentially important impact on low income communities and communities of color that already live with a heavy burden of environmental exposures. In addition, it would drive more protective cleanup plans for the state's impaired waters, which thus meets your requirement that "pollution burden indicators should relate to issues that may be potentially actionable by Cal/EPA boards and departments" (page 8).

We recognize that data on fishing and fish consumption by various communities around the state is largely lacking and is a research gap that needs to be filled. Fortunately, the State Water Resources Control Board has taken a first step by commissioning a state-wide study of fish consumption practices among California tribes as well as other cultural uses of impaired waters that put Native American communities at risk. It is to be hoped that similar studies will follow to provide a usable picture of the impacts of fish consumption from contaminated waters for other at risk populations. Clean Water Action will continue to advocate that fish consumption be studied as part of TMDL or other remediation plan development for bioaccumulative water contaminants.

Fortunately, other necessary data is available as the water boards identify the state's impaired waters as part of their responsibility under the Clean Water Act, and OEHHA develops fish advisories for those waters. Consequently, as OEHHA looks toward the future and the next iteration of CalEnviroScreen, we urge the Office to:

- work with the State and Regional Water Boards and Department of Public Health to close the data gaps on fishing practices and the particular threats to low income communities and communities of color which have high levels of contaminated fish consumption out of economic need or cultural tradition so that protective actions can be taken, and
- include bioscreening of bioaccumulative water contaminants that impact human populations through consumption of locally caught fish in its program.

Sincerely,



Andria Ventura
Program Manager