

COMMONWEAL

com•mon•weal (n) kôm' an-wél noun 1. The public good or welfare 2. Archaic: a commonwealth.

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John Faust
Office of Environmental Health Hazard Assessment
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via email: john.faust@oehha.ca.gov

Dear Mr. Faust:

Commonweal has recently begun to track the work of OEHHA's Cumulative Impacts and Precautionary Approaches workgroup, and are submitting the following comments on OEHHA's development of the California Communities Environmental Health Screening Tool (CalEnviroScreen).

*** Value of examining cumulative impact.**

The first thing to say is that a tool like CalEnviroScreen that measures cumulative impact is necessary, useful, and important. It will provide data points to decision-makers on a range of policy options as well as inform residents of California about health and environmental issues in the areas they live. Thank you for moving this forward.

*** Re Exposure Indicators.**

We recommend adding biomonitoring data when available from the California Environmental Contaminants Biomonitoring Program (CECBP or Biomonitoring California) to the exposure indicators. If CECBP ultimately mobilizes enough resources to conduct statewide studies (as it is statutorily mandated to do), this would clearly be useful, especially for regional analysis of cumulative impact in California.

*** Re Environmental Effects Indicators.**

We recommend adding proximity to ports and military bases to the environmental effects indicators. These facilities account for major environmental emissions and living near to one should be considered in the analysis.

We also recommend adding diesel emissions to the environmental effects indicators. This is a key concern of environmental justice communities sited near complexes where truck traffic is overwhelmingly heavier than other residential areas.

*** Re ZIP code as the proposed unit of analysis.**

OEHHA has already heard from some stakeholders that census tract would be a better geographic unit because it would provide more detail and understanding on impacted neighborhoods within a ZIP code. We encourage OEHHA to continue this discussion. A short report and analysis of what data are available at the census tract level compared to ZIP code would sharpen the lens on what is possible. What is available by ZIP code that would be lost at the census tract level?

*** Re OEHHA's proposed calculation to determine cumulative impact ranking.**

You won't really know how good it is until you try it. OEHHA presented a case example in public hearing in Sacramento of a San Bernardino ZIP code (92408). One possible idea to refine this approach would be to informally run an analysis of a few dozen diverse ZIP codes, including some that represent EJ communities with community-based organizations working in them. It would be a useful exercise to see how the tool works, including a built-in opportunity for dialogue with communities to receive further input.

*** Re potential uses of CalEnviroScreen.**

OEHHA has laid out several ideas for how the information generated by CalEnviroScreen could be used, including stepped-up enforcement, targeting new resources in impacted communities, and cleanup and abatement. All of these ideas are worth further discussion and implementation, resources permitting.

A further activity we recommend is establishing a formal collaboration with the CECBP (Biomonitoring California) so that CalEnviroScreen data can inform CECBP decisions on where to conduct community-based biomonitoring studies.

In the context of how CalEnviroScreen could be used by state agencies, it must be said that given the regulated community has not taken voluntary steps to mitigate the harm their activities are causing, fees must be on the

table for polluting industries to pay for clean up and abatement, as well as other programs that will reduce cumulative impact.

But California should not wait until final decisions are made about how CalEnviroScreen will be used before finalizing the tool. The data will be useful immediately and will help guide a further discussion about what interventions should be undertaken to remedy the effects of cumulative impacts.

We believe strongly in the value of providing as much information as possible to the public, as was noted by OEHHA Director Alexeeff in the 7/30/12 OEHHA press release about CalEnviroScreen:

"The draft screening tool is meant to present a broad picture of the burdens and vulnerabilities different areas face from environmental pollutants."

*** Re next steps.**

The important task now must be to move forward quickly to finalize and deploy CalEnviroScreen so all Californians can see how our state economy's pattern of pollution is experienced in the real world of our cities, towns, and agricultural areas. The information produced by CalEnviroScreen will stimulate and inform important conversations about how to best protect public and environmental health, and to prevent the further accumulation of stressors and impacts on already over-burdened communities in California.

California needs to develop precautionary approaches and strategies that actually begin to reduce cumulative impacts. CalEnviroScreen is a part of this, but the conversation should move to the next level of action steps.

Yours truly,



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