



Email Subject Line: CalEnviro Screen Comments for January 2013 version, from CWC

January 29, 2012

Via Electronic Mail

[Draft California Communities Environmental Health Screening Tool](#)

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Dear Dr. John Faust and All Concerned Parties at OEHHA:

These comments are submitted on behalf of the Community Water Center (CWC). We are an environmental justice nonprofit organization working on the impacts of groundwater contamination on Central Valley communities and the environment, and seeking to attain access to clean, affordable and reliable drinking water for all Californians. For the low-income, communities of color we work with, cumulative impacts translates to the combined experience of environmental hazards and pollution, as well as the social vulnerabilities that exacerbate these hazards. We are appreciative of the time and effort OEHHA has taken to improve CalEnviroScreen and address many of the recommendations that we (and others) have introduced.

We commend OEHHA on addressing the multiple comments that the academic and community workshops discussed. We believe the tool has been greatly improved, though we understand certain elements may still change. While we are generally supportive of the current version of this tool, we recommend OEHHA incorporate the below comments into future versions of CalEnviroScreen. Our comments are divided into three main areas: 1) comments on the current methodology and indicators, 2) comments on future steps and drinking water and 3) comments on intended uses of the tool.

Comments on Current Methodology and Indicators

We continue to have comments and recommendations regarding the current methodology:

- It is not completely clear why some of the pollution burdens are weighted by half. At the very least, we recommend that OEHHA include an appendix with sensitivity analyses that show the difference of weighting and not weighting these indicators, and further explain the theory behind the current decision. Otherwise, it is concerning to us that groundwater

threats and impaired water bodies get less weight. Furthermore, future versions of the model should adequately assess the impact of the number and types of indicators used. At present, there are three air indicators, and only one groundwater indicator. It will be important to discuss the contribution of different environmental media to the final cumulative impact scores, especially once the drinking water indicator is included.

- We recommend renaming or further clarifying the “Groundwater Threats” indicator. This indicator appears to only account for specific point-sources of pollution. Agricultural sources of pollution such as fertilizer application are not considered. We recommend that the name of this indicator be changed to “Point-source threats to groundwater”, or that the method in that section be further clarified. Furthermore, it is unclear to us in the current document if the current indicator includes proximity to dairies. We strongly recommend that proximity to dairies be included in this indicator, or the future drinking water indicator.
- As currently written, the tool argues for a statewide assessment of cumulative impacts. As an environmental justice group working on the ground, however, it is very important to us to have a regional analysis and regional prioritization of the most impacted areas. We urge OEHHA to produce regional maps that rank cumulative impacts at a regional level (e.g. within the San Joaquin Valley). This will increase the effectiveness of a cumulative impacts tool for policy and resource applications.
- Finally, we are concerned that the impaired water bodies and groundwater threats indicators fail to capture the impact of water contamination in Central Valley communities. Since the impaired water bodies indicator is based on Clean Water Act designations, this results in a lower estimation of cumulative impact in some Central Valley communities since many communities have only groundwater (as opposed to surface water) nearby. While we expect that this problem will be addressed with the inclusion of the future drinking water indicator, in this current version, some zip-codes and communities may be ranked lower because of this issue (e.g. Seville & Lamont). For the time being, we recommend that OEHHA explain this limitation in the methods, and commit to considering the implications of this gap in any decisions (i.e. funding) that could be associated with this gap. Ultimately, it may be useful for OEHHA conduct a sensitivity analysis comparing results between rural and urban zip codes, or between different regions. This analysis could characterize the distribution of individual indicator scores in different geographic areas. This would enable us to understand which indicators are most responsible for the lower or higher scores, and potentially help assess whether some indicators are not accurately capturing realities on-the-ground, or suffer from incomplete data.
- We recommend the next version of CalEnviroScreen be at the census tract-level.

Comments on Future Steps and Drinking Water:

We understand that OEHHA will have an additional round of the tool produced, and it has not yet developed the drinking water indicator. Even so, we wish to provide comments on the future drinking water indicator. As noted in our previous comment letter, given our work on drinking water issues impacting vulnerable communities, we have the following recommendations:

- *Contaminants Vary Across Regions:* Different key drinking water contaminants are present throughout the state. In order to factor this in, we recommend regional analyses of cumulative impacts, to assess these differences. Otherwise, this will make it hard to compare the true impact of drinking water contamination in one region versus another.

- *Private well-owners, not on Public Water Systems:* In the Central Valley, we estimate that at least 20% of the population relies on private wells. The California Department of Public Health does not require sampling of these private systems. In order to capture true potential exposure, we recommend the use of additional databases (e.g. GAMA) that could estimate the potential water quality of residents relying on private groundwater wells.
- *Vulnerabilities beyond contaminants:* Communities also face vulnerability based on the physical state of infrastructure. While data on age of infrastructure is not widely available, OEHHA could potentially use: number of active sources, or the number of service connections as a proxy for the potential physical vulnerability of the system.
- *Coordinate Parallel Work that Overlaps with Other State Agency Activities:* The Department of Water Resources (DWR) is currently working on defining “Disadvantaged Communities” for the purposes of drinking water funding. To the extent possible, it would be useful if OEHHA’s approach could add to DWR’s approach, or at least address it so that we have increased consistency when identifying impacted communities. This will also ensure that cross-agency approaches and funding requirements are more compatible with each other.
- *Include proximity to water-polluting land-uses :* While the impact of dairies on local groundwater is difficult to measure, dairies have an impact on local groundwater quality. Including proximity to dairies would be important.
- *Include pesticides in groundwater:* While current drinking water databases (e.g. WQM) incorporate some pesticide data (i.e. those regulated by the Safe Drinking Water Act), Department of Pesticides Regulation (DPR) does monitor for pesticides in the groundwater including private well monitoring. We urge OEHHA to consider developing a pesticides-in-water measure based on a combination of groundwater monitoring databases.
- We ask that OEHHA provide an explicit timeline for this metric’s addition to CalEnviroScreen.

Comments on Application and Use of the Tool

At this time, one of the most critical issues for us is ensuring this tool will benefit highly impacted communities. To this end, we thank OEHHA for sharing a Google tool that allows our organization to view the current results, and recommend that this sharing continue for future versions. Most importantly, we strongly recommend that the guidance not limit potential uses of CalEnviroScreen. The range of uses for this tool has not been clearly delineated, and we think it is premature to include language limiting its use at this time. The environmental justice community has worked hard to help develop a cumulative impacts tool and believe that any limitations at this time would do a disservice to the creative and innovative work on how to reduce environmental and health disparities in our communities.

Once again, we thank you for the in-depth revisions made to this latest version of the tool, and appreciate the sincere efforts to listen to a diverse set of stakeholders across the state. We look forward to continuing to collaborate with CalEPA and OEHHA.

Sincerely,



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