



October 16, 2012

1100 K Street  
Suite 101  
Sacramento  
California  
95814

Telephone  
916.327-7500

Facsimile  
916.441.5507

John Faust  
Office of Environmental Health Hazard Assessment (OEHHA)  
1515 Clay Street, Suite 1600  
Oakland, CA 94612

Sent via email: [john.faust@oehha.ca.gov](mailto:john.faust@oehha.ca.gov)

RE: CalEnviroScreen Tool

Dear Mr. Faust,

On behalf of the California State Association of Counties (CSAC), thank you for the opportunity to comment on the CalEnviroScreen Tool. CSAC is an association that represents county government before the California Legislature, administrative agencies and the federal government. Representing all 58 of California's counties, CSAC has a long history of supporting a wide range of federal, state and local programs critical to healthy and sustainable communities.

While CSAC recognizes the importance of Cal/EPA's environmental justice policies and understands your interest in taking it a step further by developing the screening tool, we share the concerns expressed by our members and other organizations on the potential misuse and misapplication of the tool. We also echo concerns regarding other aspects of the screening tool and the process that has led to its development, including the:

- Lack of outreach to local government during the early development of the screening tool;
- Contradictory statements made in CalEPA/OEHHA documents, including the July 30 memo to the working group and the public review draft, concerning the intended use of the screening tool, particularly with respect to reviews under the California Environmental Quality Act (CEQA);
- Lack of specific guidance on how this tool is intended to be used by local governments in California;
- Potential use of the screening tool scores to form the basis for further regulatory requirements and controls that exceed current Federal, State and local environmental and regulatory requirements;
- Failure of the tool to distinguish between health effects due to socioeconomic factors or other social stressors and those due to chemical/pollution exposure; and,



- Potential for redlining of communities that result in a disincentive to job creation and economic expansion, contrary to the goal of this tool.

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As an attendee to the October 2 workshop for local government I was pleased to hear Secretary Rodriguez indicate that the workshop was a starting point for other discussions with local government. Given his statement and our interest in ensuring an ongoing role for local government in your process, we would be happy to help facilitate future discussions between CalEPA/OEHHA staff and local officials including county planners. We believe their perspective will help with the development of a usable tool without creating duplicative requirements or disincentives to job creation and economic development.

In conclusion, we respectfully request your serious consideration of the comments and concerns raised. Should you have any questions regarding our comments, please feel free to contact me at 916-327-7500, ext. 511, or [kkeene@counties.org](mailto:kkeene@counties.org).  
Sincerely,

A handwritten signature in black ink that reads "Karen Keene".

Karen Keene  
CSAC Senior Legislative Representative