



425 S. Palos Verdes Street Post Office Box 151 San Pedro, CA 90733-0151 TEL/TDD 310 SEA-PORT www.portoflosangeles.org

Antonio R. Villaraigosa

Mayor, City of Los Angeles

Board of Harbor  
Commissioners

Cindy Miscikowski  
President

David Arian  
Vice President

Robin M. Kramer

Douglas P. Krause

Sung Won Sohn, Ph.D.

Geraldine Knatz, Ph.D.

Executive Director

October 16, 2012

John Faust  
Office of Environmental Health Hazard Assessment  
1515 Clay St., Suite 1600  
Oakland, CA 94612  
john.faust@oehha.ca.gov

Dear Mr. Faust:

**SUBJECT: DRAFT CALIFORNIA COMMUNITIES ENVIRONMENTAL HEALTH SCREENING TOOL**

The City of Los Angeles Harbor Department (LAHD) commends the Office of Environmental Health Hazard Assessment (OEHHA) for developing the *Draft California Communities Environmental Health Screening Tool (CalEnviroScreen)*. We understand the model could be used to help decision-makers focus their time, resources, and programs on those portions of the state that have higher vulnerabilities and burdens. However, for reasons we have indicated below, we urge caution in use of this model at this stage in its development. While it may give an indication of which communities may have a greater potential for health issues than others, a better nexus will be needed to identify responsible parties and solutions. We submit the following comments for your consideration:

Comment 1 – A major weakness of the model is that it uses pollution burden indicators as surrogates for exposure assessments. This approach could under- or over-estimate human exposure to pollutants. For example, the model uses the total number of hazardous waste sites within a zip code (based upon data from the Department of Toxic Substances Control) as a surrogate for exposure to hazardous wastes. The model does not take into account the characteristics of contaminated media, the chemicals of potential concern, or the chemical concentrations at each of the hazardous waste sites. Another example is the use of California Air Resources Board (CARB) air monitoring data. It seems a stretch to assume that ozone and PM<sub>2.5</sub> data collected from roughly 40 stations could be used to estimate ozone and PM<sub>2.5</sub> concentrations for most of the state.

Comment 2 – It is unclear how *CalEnviroScreen* would be used by the public. To date, OEHHA has given contradictory information regarding the use of *CalEnviroScreen*, noting that it could potentially be used to “assist in establishing the environmental setting for a proposed project, identifying cumulative impacts requiring environmental

review, and might be useful in analyzing and formulating appropriate alternatives and mitigation measures”. However, in distinguishing the *CalEnviroScreen’s* definition of Cumulative Impacts from the definition used in CEQA, OEHHA has stated “therefore, the data and ranking generated by this tool cannot be used as a substitute for an analysis of the cumulative impacts of any specific project”.<sup>1</sup>

Comment 3 – The mathematical structure of the model is not supported by scientific data.

Thank you for the opportunity to comment on *CalEnviroScreen*. We look forward to your response to our comments. Should you have any questions, please contact me at 310.732.3675.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christopher Cannon', with a stylized flourish at the end.

CHRISTOPHER CANNON  
Director of Environmental Management

---

<sup>1</sup> Memorandum from Arsenio Y. Mataka/CalEPA and George Alexeeff/OEHHA to Cumulative Impacts and Precautionary Approaches Work Group dated July 30, 2012. Subject: Draft California Communities Environmental Health Screening Tool (Cal-ENVIRONSCREEN).