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CalEnviroScreen
Dr. John Faust, Chief
Community Assessment and Research Section
Office of Environmental Health Hazard Assessment
1515 Clay St., Suite 1600
Oakland, CA 94612

Subject: CalEnviroScreen 3.0

Dear Dr. Faust:

I am writing to express my concerns that CalEnviroScreen still fails to adequately address the needs and fails to truly represent the conditions and impacts in poor rural areas. Lake County has significant economic issues, but there are others commenting about economic issues in rural areas, so I will concentrate on the pollution burden issues.

As CalEnviroScreen was introduced to consolidate pollution burdens and population characteristics into a comprehensive model which has become the primary model for making determinations of where many sources of funding is spent. As a small rural agency, with a staff of 5, we normally can not comments on items such as this, but the impact of CalEnviroScreen has been so significant that we have to express our concerns. They are as follows:

Air Quality issues: It is unclear whether the air quality data utilized includes all monitoring data or is the data taken after exception events are flagged? If these data sets do not incorporate the exceptional events, then they are not adequately representing the air quality that residents are breathing. In rural areas, episodic impacts, specifically wildfire impacts do occur. These impacts are excluded from our data of record as exceptional events, but should be included in the pollution burden calculation as it represents the true 'what people actually breath.' Even as the only Air Basin in California to meet all air quality standards, we have significant localized and episodic impacts that are not represented in the data set utilized for the model.

Diesel Particulate Matter: The Diesel particulate input for the model is based on a CARB model of vehicle miles traveled. We are unable to determine if CARB actually verifies their model in the rural areas or if they just make assumptions based on population. A rural fleet makeup is very different from the typical statewide fleets and many of the miles traveled are in towns, main streets,

residential areas, and near schools. Many of our schools are located within 100 meters of a highway. If non-road diesel PM is included in this category, the estimates are unlikely to be close to reality in Lake County as much of our local agricultural equipment is very old and very little equipment is included in the inventory as it has never been registered.

Toxic Releases from Facilities: The use of a prioritization tool to rank impacts from major sources does not adequately address air quality concerns in rural areas. We have no major sources, but our communities are smaller, so small sources can have toxic releases (that are not reportable quantities for EPA) but can have significant impacts to the neighboring community. But as they do not meet the threshold for Federal reporting, this data is not utilized. This also does not take into account the toxic releases from wildfires, naturally occurring asbestos in our soils, and other localized toxic releases.

Traffic Density: The traffic input into the model uses a private company's data set, who supposedly collects data from around the state related to traffic levels. But there is no way to confirm whether Lake County data is included for County roads, or if they just use the CalTrans Highway numbers only. Data sets in the larger urban areas are going to be much more accurate and in demand, so the are likely to be more complete for those areas. We do not have access to the Trafficmetrix data used by CalEnviroScreen to determine if it is accurate or complete. Additionally the method of calculating traffic density seems to address the fact that there are hundreds of miles of rural roads in rural areas, it appears that the rural roads dilute the traffic density calculation resulting in a lower pollution burden from traffic in the populated areas. This is not a factor in most urban areas where every road is through developed lands, and the calculated pollution burden for all areas in the census tract is fairly accurate.

Cleanup sites: In rural areas, the Envirostor database is not always up to date. This is the database used by CalEnviroScreen for cleanup sites. There is no data for some listed sites, they have the wrong environmental media listed for potential impacts, and some sites may be missing completely as they have not been adequately evaluated yet.

Hazardous Waste Generators: The dataset included appears to only incorporate large generators, which do not tend to be located in rural areas. But, there are many smaller generators, whose operations are located close to, or even next to do residential housing. The scale of the generator is one factor, but the location of the generator and proximity to disadvantaged residential areas is a significant factor that is not captured.

So in summary the problems were have with CalEnviroScreen 3.0 (and previous versions) is that it uses proprietary data sets that can not be adequately verified in the rural areas. Many of the data sets are from other models, which were not designed or intended to be used for this type of pollution burden model. The model

takes into account only the largest sources, which don't exist in rural areas, and it fails to adequately account for toxic impacts and risk associated with the smaller communities and rural environmental conditions (wildfires, etc).

CalEnviroScreen is useful in Urban areas to identify areas of concern that should be looked into further. But if grant funding continues to be tied to CalEnviroScreen, the model needs to be overhauled and upgraded to incorporate smaller sources, have better data sourcing, require ground truthing of data sets, and have the data sets updated regularly. This model is inadequate for rural areas as is under represents the pollution burden due to the scale of the model and data sets.

I hope that this tool can be upgraded to adequately represent the pollution burdens in different areas of the State, whether urban or rural. With funding eligibility tied to this model, we need a tool that will bridge the burdens (pollution and economic) in rural areas to ensure that these communities have the opportunity to explore GHG reduction projects that will help reduce pollution burden, increase economic opportunities, and provide unique but cost effective GHG reductions.

Sincerely,

Douglas Gearhart, APCO