



January 28, 2013

Orange County  
Council of Governments  
Member Agencies

Aliso Viejo  
Anaheim  
Brea  
Buena Park  
Costa Mesa  
Cypress  
Dana Point  
Fountain Valley  
Fullerton  
Garden Grove  
Huntington Beach  
Irvine  
La Habra  
La Palma  
Laguna Beach  
Laguna Hills  
Laguna Niguel  
Laguna Woods  
Lake Forest  
Los Alamitos  
Mission Viejo  
Newport Beach  
Orange  
Placentia  
Rancho Santa Margarita  
San Clemente  
San Juan Capistrano  
Santa Ana  
Seal Beach  
Stanton  
Tustin  
Villa Park  
Westminster  
Yorba Linda  
County of Orange  
OCTA  
TCA  
OC Sanitation District  
ISDOC  
South Coast AQMD

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

**Subject: Orange County Council of Governments Concerns  
Regarding CalEnviroScreen Proposed Screening Tool**

Dear Mr. Faust:

The Orange County Council of Governments (OCCOG) welcomes the opportunity to submit our comments on the proposed California Communities Environmental Health Screening Tool (CalEnviroScreen) for identifying environmental justice communities within the state. The OCCOG is a joint powers authority representing the County of Orange and 34 cities in Orange County. The OCCOG serves as a subregional organization to the Southern California Association of Governments (SCAG) representing Orange County on mandated and non-mandated regional planning activities, to provide a vehicle for members to engage cooperatively on such activities, and to conduct studies and projects designed to improve and coordinate common governmental responsibilities and services on an area-wide and regional basis.

The OCCOG is in the process of reviewing the recently released second draft of the CalEnviroScreen tool and the raw data that was released on January 16, 2013. The OCCOG wanted to ensure that our general concerns and comments, excluding the technical comments, were provided to the Office of Environmental Health Hazard Assessment (OEHHA) prior to the close of the public comment period. In particular:

- Several elected officials from Orange County and technical staff from Orange County jurisdictions attended the December 12, 2012 workshop held at the SCAG Offices. For the majority of the people in attendance at that workshop, this was their first exposure to the CalEnviroScreen tool as the public outreach to stakeholders in Southern California was very limited. Staff from OEHHA and the California Environmental Protection Agency (Cal/EPA) indicated that a second workshop would be held in Southern California after the release of the second draft, and prior to the close of the public comment period. The OCCOG

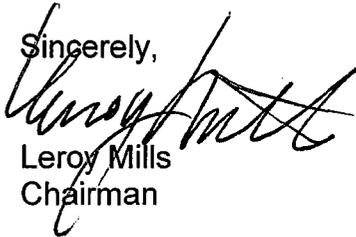
John Faust  
January 28, 2013  
Page 2

is concerned with the limited outreach to interested stakeholders following the release of the second draft of the CalEnviroScreen tool, noting that SCAG Regional Council members and interested stakeholders were notified less than 24 hours prior to the workshop/public hearing held in Sacramento on January 11, 2013.

- The public review period closes approximately three weeks after the release of the second draft of the CalEnviroScreen tool. This allows very limited time to review the document and prepare comments prior to the close of the public comment period. Furthermore, the raw data used to develop the indicator maps and the CalEnviroScreen Result maps included in the second draft of the CalEnviroScreen tool were released on January 16, 2013, allowing jurisdictional staff limited time to review the raw data and formulate comprehensive technical comments.

Thank you again for the opportunity to submit these comments on the proposed CalEnviroScreen tool. We will be providing you with technical comments in a follow-up letter to be forwarded in early to mid-February 2013. We look forward to your response to both letters. If you have any questions please contact Dave Simpson, OCCOG Executive Director, at (714) 560-5570 or DSimpson@octa.net.

Sincerely,



Leroy Mills  
Chairman