



January 31, 2013

Office of Environmental Health Hazard Assessment  
Attn: Dr. John Faust  
Chief, Community Assessment and Research Section  
1515 Clay Street, Suite 1600  
Oakland, CA 94612  
VIA E-MAIL

Dear Dr. Faust,

The Pasadena Chamber of Commerce and Civic Association has significant concerns about the proposed Office of Environmental Health Hazard Assessment CalEnviroScreening Tool.

Based on our assessment of the proposed tool, the Pasadena Chamber is very concerned that its use would cause significant negative impacts to proposed projects in areas identified as high-ranked communities. In short, the tool, if used as proposed, could negatively impact investment in communities that are most in need of jobs, economic development and financial investment.

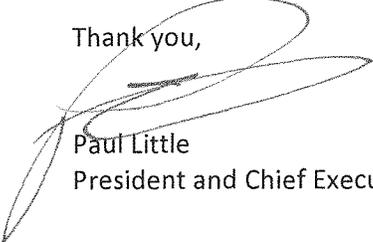
We are very concerned that the methodology proposed is seriously flawed. We do not see how the proposal could be appropriately implemented as it lacks any real scientific basis for a determination.

Here is just one example of what we see as a fatal flaw in the proposal: the use of zip codes to determine study areas and impacts. Zip codes do not identify economic status, levels of environmental impact, nor are they in any way uniform. A zip code that may contain environmentally and economically impacted households can also be home to just the opposite, as is often the case in Pasadena. Does a project in an area of a zip code that would not be identified as high-ranked be required to perform a full Environmental Impact Report because it shares a zip code with properties that could be high-ranked?

Even on this one single aspect of the proposal, it fails any test of rigor and certainly fails as a scientific method of making a determination.

The Pasadena Chamber of Commerce would like to go on record as opposing the use of the CalEnviroScreening Tool as currently proposed.

Thank you,



Paul Little  
President and Chief Executive Officer