

September 23, 2010



Dr. Joan Denton, Director  
Office of Environmental Health Hazard Assessment  
1001 "I" Street  
Sacramento, CA 95814

**RE: OEHHA's "Cumulative Impacts: Building a Scientific Foundation, Public Review Draft, August 19, 2010" Report**

*Bay Area  
Clean Water Agencies*

*Bay Planning Coalition*

*California Association  
Of Sanitation Agencies*

*California Council for  
Environmental &  
Economic Balance*

*California Manufacturers  
& Technology Association*

*Chemical Industry Council*

*Chlorine Chemistry Council*

*Contra Costa Council*

*Tri-TAC*  
Sponsored by:  
League of California Cities  
California Association of  
Sanitation Agencies  
California Water  
Environment Association

*Western States  
Petroleum Association*

**Craig S.J. Johns  
Program Manager**

Dear Dr. Denton:

The Partnership for Sound Science in Environmental Policy (PSSEP) is an association of San Francisco Bay area and statewide public and private entities – businesses, municipal wastewater treatment agencies, trade associations and community organizations. PSSEP and its members support and promote regulatory actions that are based on sound science and achieve reasonable protection of human health and the environment. We appreciate the opportunity to comment on OEHHA's "**Cumulative Impacts: Building a Scientific Foundation, Public Review Draft, August 19, 2010**" Report ("CI Report").

PSSEP has participated in the Cal/EPA "Cumulative Impacts and Precautionary Approaches Working Group" since its inception, and remains interested in OEHHA's efforts to develop "screening methodologies" for evaluating cumulative impacts of actions or processes regulated by the Cal/EPA agencies and boards.

PSSEP supports and hereby incorporates the comprehensive analysis and comments of the CI Report submitted by CCEEB. In particular, PSSEP agrees that any health-based regulatory standards adopted or implemented by Cal/EPA agencies and boards **must** apply equally to and among all Californians. PSSEP can find no rational basis for developing inconsistent standards on the basis of income, race and/or ethnicity, and we doubt that such standards, were they to be promulgated, would withstand judicial scrutiny. Lastly, PSSEP concurs that **before** screening methodologies are finalized by OEHHA or any of the Cal/EPA boards and agencies, those boards and agencies should first determine how and what purpose the screening is to be utilized.

Sincerely,

Craig S.J. Johns  
Program Manager