

January 30, 2013

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

Re: Comments on Second Draft California Communities Environmental Health Screening Tool

Dear Mr. Faust:

The Santa Barbara County Air Pollution Control District would like to thank OEHHA for its consideration of our comments on the first draft of the California Communities Environmental Health Screening Tool. Below please find the comments from our agency on the second draft version of the California Communities Environmental Health Screening Tool.

Comments previously submitted on the first draft but not fully addressed in the second draft:

- We still believe the use of 2010 Census Zip Code Tabulation Areas (ZCTAs) as the geographic unit of analysis is not ideal for this project. One issue is the large areas of the state that are not covered by ZCTAs, which produces results that appear incomplete to the end user (e.g. roughly 1/3 of Santa Barbara County has no results due to no ZCTAs for those areas). While most of the areas not covered by ZCTAs may be sparsely populated, there will certainly be some amount of people excluded from this study due to this choice in geographic unit. In addition, there may be significant confusion to the end user due to the differences between the ZCTAs and the Postal Service Zip Codes most people are familiar with. Choosing a geographic unit that is similar to but not the same as a familiar geographic system opens the doors for public confusion and misinterpretation of the results of this study. Footnote 3 on page 6 of the document states future versions of the tool will use a census tract scale. Why not use the census tract scale for the initial version of the tool as well?
- We disagree with the decision to include cleanup sites designated as “certified”, “completed”, and “no further action” in the Cleanup Sites Indicator of this study. By definition, cleanup sites designated with any of these statuses have been remediated properly and do not pose a risk to public health or the environment. Based on the weighting system outlined in the second draft document, these clean sites could potentially be weighted near to or even in some circumstances greater than other cleanup sites requiring remediation or actively undergoing remediation.
- The weighting system applied to the Groundwater Threats indicator seems to disproportionately weight certain types of sites over others. An active “Cleanup Program Site” is weighted 15 while an active “LUST Cleanup Program” is weighted only 5. In our experience, many of the sites designated as “Cleanup Program Site” have contamination less than or equal to “LUST Cleanup Program” sites. We feel it is nearly impossible to weight sites based on the site types contained within the GeoTracker database, and suggest weighting these sites only based on their statuses. In addition, it is not clear if sites designated “clean closed” were excluded from the analysis, but we recommend they be excluded if they were included in the second draft study.

- We disagree with the indicator used for the Impaired Water Bodies section of this study. Using the summed number of pollutants across all water bodies designated as impaired does not seem like the best way to characterize the cumulative impacts from polluted water bodies. This method does not take into account the differences in potential health hazards of the different pollutants and by how much the water quality standards are exceeded. This could lead to a water body with several relatively benign pollutants just over the water quality standards being weighted significantly worse than a body of water with one or two dangerous pollutants well above the water quality standards.
- We do not believe that solid and hazardous waste sites and facilities should be included in the Environmental Effects Indicator of this study. Properly operated waste disposal sites do not pose health threats to the surrounding communities, and do not contribute to the cumulative impacts of the surrounding area. If these types of facilities must be included in this study, we recommend only including the sites with histories of non-compliance.

New comments specific to the second draft:

- Why were the Environmental Effects indicators weighted at one half the values of the Exposure indicators in the CalEnvrioScreen Score equation in the second draft? Please provide the rationale for this change to the original equation.
- Why were diesel particulate matter (PM) concentrations for certain ports and rail yards obtained from HRA results while diesel PM concentrations for other areas obtained from the 2005 NATA data? Using two sources of data could lead to inconsistencies in the results, and using alternative data where available casts doubt on the accuracy of the 2005 NATA data.
- Including ozone concentration, PM<sub>2.5</sub> concentration, diesel PM concentration and traffic density in the Exposure Indicator section of this study may result in over-counting of exposure risk due to overlap between these indicators.
- Including both the Cleanup Sites category and the Groundwater Threats category in the Environmental Effects Indicator could lead to double counting the of the same clean-up sites. During our quick review, we found several clean-up sites included in both the EnviroStor database and the GeoTracker database for one small area in the City of Santa Barbara.
- The definition of child in the Age Indicator changed from less than 5 years of age to less than 10 years of age from the first draft to the second draft. Please explain the reason for this change, and provide the rationale for the new age definition of children.
- The definition of the Linguistic Isolation Indicator is written as “percentage of households in which no one age 14 and over speaks English ‘very well’ or speaks English only.” This definition is confusing, and makes it sound like households which only speak English were included in this indicator, which we believe is not the case. Please consider re-wording this definition.

Thank you for providing us with the opportunity to provide additional comments on the second draft of the California Communities Environmental Health Screening Tool. If you have any questions regarding this letter, please contact me at (805) 961-8824 or [harrisd@sbcapcd.org](mailto:harrisd@sbcapcd.org).

Sincerely,

A handwritten signature in black ink, appearing to read "David Harris", with a long horizontal line extending to the right.

David Harris, Air Quality Engineer III  
Engineering & Compliance Division

cc: Michael Goldman, SBCAPCD