



**Santa Barbara County  
Air Pollution Control District**

October 1, 2012

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

Re: Comments on Draft California Communities Environmental Health Screening Tool

Dear Mr. Faust:

The following represent the comments from the Santa Barbara County Air Pollution Control District regarding OEHHA's Draft California Communities Environmental Health Screening Tool.

**Conceptual Comments**

- We appreciate the hard work and effort that went into undertaking and completing this project, but we are concerned with how the final results of this screening tool may be presented to and interpreted by the general public. We have found that the results of studies similar to this project have often caused unwarranted worry and alarm in the general public when not presented properly or taken out of context. The simplicities of the analysis and the scale at which the project was completed significantly limit how the results of this project should be used and viewed. We feel that it is very important to present and stress upon the limitations of this project early and often within the final document.
- There is no explanation or derivation provided for the formula used to calculate the cumulative impacts in this study. This formula is at the center of this project and is used to calculate the overall relative cumulative impact score for each zip code area. More details on how this formula was developed would be appreciated.
- There is no explanation or reasoning provided for the ranges of possible scores used for the various components of the cumulative impact calculation. When calculating the cumulative impact using the equation provided, the ranges of possible scores for each component have a great effect on the cumulative impact results. Please provide details on the reasoning for the ranges used (for example, why is Exposure given a range of 1-10 while Sensitive Populations is given a range of 1-3?).

**General Comments**

- We would like to be provided an opportunity to review and comment on the raw data (especially the Exposure and Environmental Effects data) used in this study to ensure it meets the stated criteria of "complete", "accurate" and "current". We have found many errors in the past when reviewing data used for similar studies. For example, we found several errors and issues with the Toxic Release Inventory (TRI) data during our review the US EPA's 2005 National-Scale Air

Toxics Assessment (NATA) study. This same TRI data is used in the Toxic Releases from Facilities section of this study.

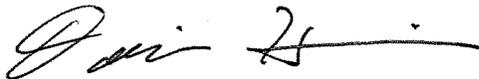
- We believe the use of 2010 Census Zip Code Tabulation Areas (ZCTAs) as the geographic unit of analysis may not be ideal for this project. One potential issue is the large areas of the state that are not covered by ZCTAs, which produces results that may appear incomplete to the end user. While most of the areas not covered by ZCTAs are sparsely populated or unpopulated, 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.
- Please make detailed results maps available for all areas of California, including the Santa Barbara County area. Detailed regional area maps have been made available for the Oakland, Fresno, Seaside/Salinas, Sacramento, San Diego, Los Angeles, and San Bernardino areas. Detailed maps of our County will significantly aid in the review of this study, and enable us to provide meaningful results to the public.
- We disagree with the decision to include cleanup sites designated as “certified”, “completed”, and “no further action” in the Environmental Effects – Cleanup Sites section 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 Appendix A2 of the 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.
- Please explain the reasoning for the proposed indicator in the Environmental Effects – 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.
- It is unclear what sources are included in the Environmental Effects - Leaking Underground Storage Tanks and Cleanups section of this study. The text of this section and the title itself focuses on leaking underground storage tanks, but the GeoTracker database used as the data source for this section covers additional types of soil contamination and remediation projects (dry cleaners, electronics device manufacturers, printers, etc.). Does this section of the study just include leaking underground tanks and cleanups, or are other types of soil contaminations included as well? If other soil cleanup project types are included in the analysis, we suggest changing the name of this section and clarifying in the subsequent discussion that these project types were included.
- The weighting system applied to the Environmental Effects - Leaking Underground Storage Tanks and Cleanups section and detailed in Appendix A3 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 equal to or less than “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 draft study.

- We do not believe that solid and hazardous waste sites and facilities should be included in the Environmental Effects section 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.
- Please provide the reasoning for using the percent of population under age 5 as the indicator for children in the Sensitive Populations section of this study. Other OEHHA documents have used different ages (under age 9, under age 16, etc.) to define children. Where did the under 5 years of age definition used in this study come from?
- Including both income and poverty level as indicators in the Socioeconomic Factors section seems to be double-counting the greater negative health effects associated with lower income populations. We believe it makes sense to include one or the other, but not both. If both indicators are retained for the final study, please explain the reasoning for including both poverty and income.

Thank you for providing us with the opportunity to provide comments on this draft screening tool. If you have any questions, please contact me at (805) 961-8824 or [harrisd@sbcapcd.org](mailto:harrisd@sbcapcd.org).

Sincerely,



David Harris, Air Quality Engineer II  
Engineering & Compliance Division

cc: Michael Goldman, SBCAPCD