

October 16, 2012

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

Subject: CalEnviroScreen (Draft California Communities Environmental Health Screening Tool)

Dear Mr. Faust,

SMAQMD appreciates OEHHA's hard work and commitment in developing the draft California Communities Environmental Health Screening Tool to identify communities that are disproportionately impacted by multiple pollution sources with the goal of reducing environmental justice disparities across the state. OEHHA's goal is laudable and the information the Tool will provide could be very important and useful to local agencies, business/industry, non-governmental organizations, and others.

However, SMAQMD is concerned that the draft Tool in its current form could lead to serious unintended consequences in the land use development planning and CEQA review process, as well as the air district permitting process. Most of our CEQA-related concerns were conveyed by my staff at the October 2 workshop in Sacramento. We are also concerned about the use of TRI and several additional air quality data sets and indicators, as well as the specific methodology used to calculate the cumulative impacts score. Many of our concerns are shared by other interested parties who have already submitted comments to OEHHA.

Unfortunately, the comment period and notification afforded by OEHHA was not sufficient to allow for a detailed comment letter at this time. SMAQMD looks forward to providing our concerns in more detail within the next several days, and then working with OEHHA in the upcoming months to improve the tool.

Draft California Communities
Environmental Health Screening
Tool

SMAQMD Comments

Sent Via Email Only

Sacramento Metropolitan Air Quality Management District
777 12th Street, 3rd Floor ■ Sacramento, CA 95814-1908
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www.airquality.org

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Again, we appreciate OEHHA's goal of alleviating environmental justice disparities and we recognize the hard work put into this effort thus far. Thank you for your time and consideration. Please do not hesitate to contact me if you have any questions about this letter.

Sincerely,



Larry Robinson
Program Coordinator, Land Use and Transportation Programs
Sacramento Metropolitan Air Quality Management District

C: Brigette Tollstrup, Sacramento Metropolitan Air Quality Management District
Dave Gross, Sacramento Metropolitan Air Quality Management District
Jorge DeGuzman, Sacramento Metropolitan Air Quality Management District
Tim Taylor, Sacramento Metropolitan Air Quality Management District
Larry Greene, Sacramento Metropolitan Air Quality Management District