



January 31, 2013

CalEnviroScreen
c/o John Faust
Chief, Community Assessment and Research Section
Office of Environmental Health Hazard Assessment
1515 Clay Street, Suite 1600
Oakland, CA 94612

Subject: Comments on CalEnviroScreen

Dear Dr. Faust,

Thank you for the opportunity to comment on the updated draft of CalEnviroScreen and the associated draft guidance document.

While we appreciate the changes that OEHHA has made within the guidance document to help clarify when the tool should or should not be used, we strongly believe that additional language is needed to explicitly emphasize that the tool cannot be used for regulatory or permitting program requirements.

CalEnviroScreen identifies impacted communities throughout the state and red flags them based upon a combination of environmental exposures and socio-economic factors within that community. We remain particularly concerned that the production-agriculture application of pesticides is automatically assumed to create a 100% exposure level for people living within a particular area. Utilizing the pesticide use reporting database as the data source for this indicator further compounds this concern. The simple use of a pesticide does not necessarily translate into a pesticide exposure. Pesticides are highly regulated at both the federal and state levels to ensure their safety. Any restrictions on use are notated on the pesticide label and pesticide applicators are required to abide by these restrictions. Pesticide labels are designed to specifically spell out application instructions so that there is no exposure.

We do believe that this tool may be helpful in prioritizing incentive funding in areas of the state that could benefit from further assistance to encourage job creation and community investment. This would provide a positive overall benefit to the community.

Western Growers Association looks forward to working further with Cal/EPA and OEHHA on CalEnviroScreen and we encourage you to contact us should you have any questions or require additional information.

Sincerely,

A handwritten signature in cursive script that reads "Matthew Allen".

Matthew Allen
CA Government Affairs
Western Growers Association
1415 L Street, Suite 1060
Sacramento, CA 95814