

Sofia Mitchell

May 14, 2021

Office of Environmental Health Hazard Assessment

P. O. Box 4010

Sacramento, California 95812-4010

(916) 324-7572

RE: Comments on CalEnviroScreen 4.0

Dear Ms. Mitchell and OEHHA Employees,

The CalEnviroScreen tool has been the best health screening tool that I have had at my disposal for a number of years. I first became aware of the tool when I learned about a Workshop for CalEnviroScreen 3.0 beta that I attended in Los Angeles a number of years ago. Since that time, I have used that tool for a number of purposes.

I did attend the ZOOM meeting for CalEnviroScreen 4.0 beta for the Los Angeles area. I was able to comment at their meeting on the power point that they gave which is here:

<https://oehha.ca.gov/media/downloads/calenviroscreen/presentation/calenviroscreen40webinarslidesd12021.pdf>

Summary:

This tool – CalEnviroScreen 4.0 is important to me for four primary reasons:

- 1) I use it to look at the risks of local hazardous waste sites that are under the control of your sister agencies the Department of Toxic Substances Control (DTSC) and the WaterBoard – in my case, the Los Angeles Regional Water Quality Control Board (LARWQB). This includes the Santa Susana Field Laboratory site which is about 5 miles west of my home.
- 2) I use the tool to look at the area where I live, and an area due east of me known as “Warner Center”. There are a number of WaterBoard sites in the Warner Center area. They include the formerly known as Rocketdyne Canoga Avenue site which is about one mile east of my home, Catalina Yachts which also used to be a part of the Rocketdyne complex, and a Litton site now known as Northrup – Grumman in Woodland Hills. I also recently learned of another Litton site in Canoga Park.
- 3) I use these tools to comment on future projects. For example, the Rocketdyne Canoga Avenue property is in what is known as the Warner Center Specific Plan area aka: Warner Center 2035 Plan (WC 2035) area. It is my opinion that when this Specific Plan area was created, the planners – both community members and Los Angeles City Planning staff may not have had access to a tool like CalEnviroScreen. Therefore, it is my opinion that uses for future development that are proposed for Warner Center did not consider the potential for groundwater contamination or the potential air quality that would be experienced by building residential in certain locations particularly within 500 feet of the 101 Freeway.

This is a link to the WC2035 map: <https://planning.lacity.org/odocument/a9d2bd2b-96a6-49fb-9059-35f1dfa35da6/1planarea.pdf>

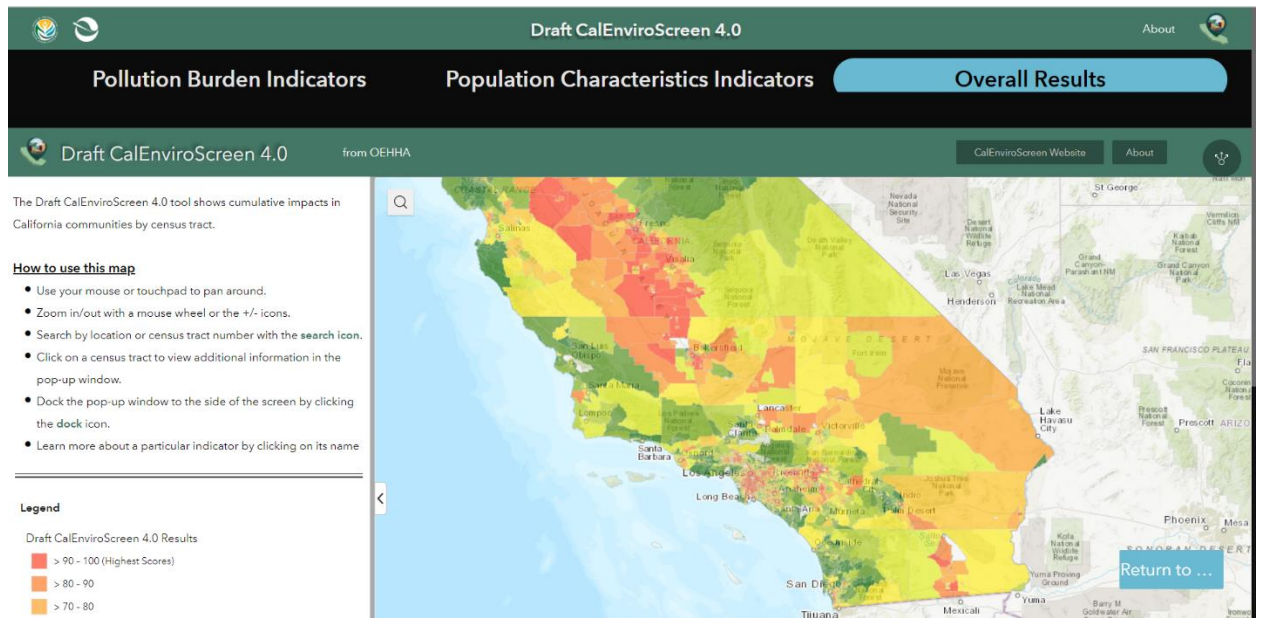
You can see that its southern boundary is the 101 freeway between DeSoto Avenue and Topanga Canyon Boulevard.

- 4) It is also my opinion that when the Warner Center Specific Plan was created it did not consider any Environmental Justice laws and therefore there is no allocation by right of the WC2035 Plan for affordable housing.
- 5) I recently attended a meeting on the Los Angeles River Master Plan. Who ever made that presentation did state that they did use CalEnviroScreen in their consideration of the the potential impacts of the LA River Master Plan on the 51 mile length of the Los Angeles River from its origins in Canoga Park to its end in Long Beach.
- 6) Finally, I have family members who live as far north as the Fresno area to others who live in Orange County. Historically, the CalEnviroScreen 3.0 tool enabled me to tell them areas to avoid when purchasing a home. Today, I am using the CalEnviroScreen tool for that same purpose.
- 7) In my comments at the CalEnviroScreen 3.0 beta meeting, I had asked why Radon maps were not utilized in determining radon as a potential health risk factor. I notice that in your groundwater analysis you do reference Gross Alpha, but I don't see any other reference to naturally occurring radionuclides in the area. This is a link to a Potential radon zone map for the Los Angeles area:
https://www.conservation.ca.gov/cgs/Documents/Publications/Special-Reports/SR_182-Radon-Map.pdf
- 8) This is a link to the EPA's Interactive Radon Map: <https://www.epa.gov/radon/find-information-about-local-radon-zones-and-state-contact-information#radonmap>
- 8) My community as I have mentioned in comment #1 above, is subject to a lot of misinformation in my opinion relative to offsite risk related to the Santa Susana Field Laboratory (SSFL). Many people believe that we have cancer clusters in my community caused by the SSFL site. That includes the belief that historic engine tests and nuclear research lead to widespread contamination in my community of West Hills and the areas surrounding the SSFL site. It is my opinion that I there are too many potential contaminants in our own home environments as well as in our external environments which are seen in the CalEnviroScreen 4.0 tool that indicate so many potential chemicals that can cause health risks and with Population factors, cause other diseases as indicated in your Population Factors tool.
- 9) I am going to start with showing screen shots that I took to inform me of each of the Pollution Burden and Population Characteristic tools that combine to create the overall score for a Census tract.
- 10) I am going to move to more specific locations and indicate to you where I see a need to relocate mapped locations which I believe are in error.
- 11) I want to add what I mentioned at the CalEnviroScreen Workshop – that I believe that the DOGGR well map locations should also be a feature on your map. This past week, I

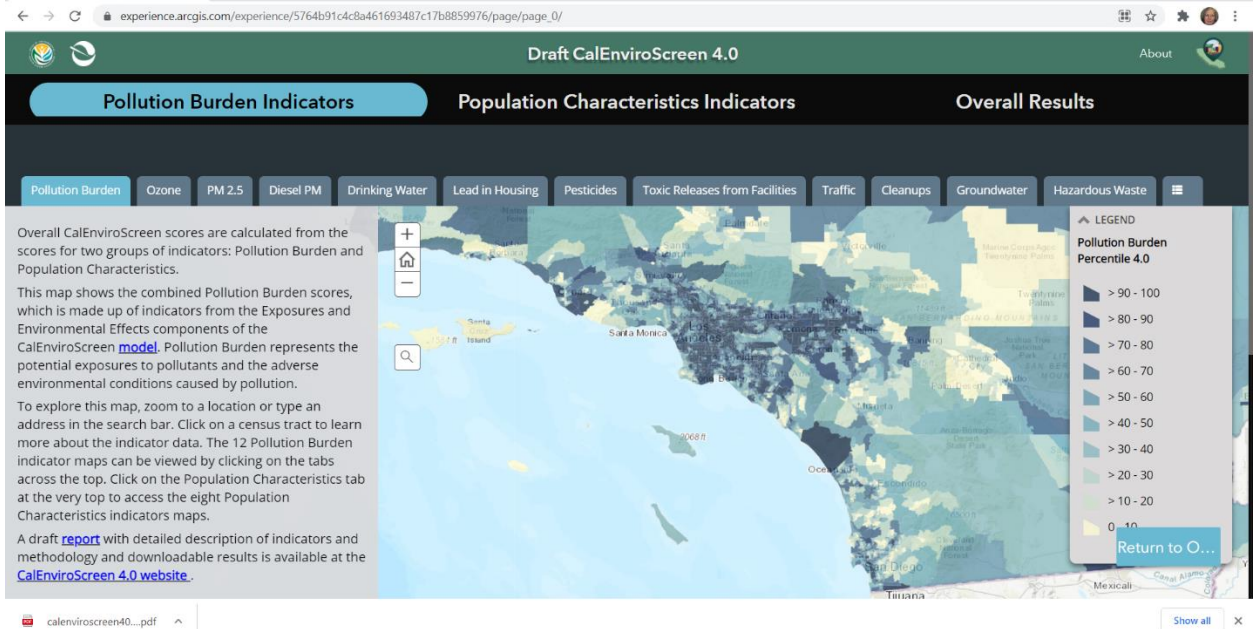
received a notice from the AQMD of a natural gas release in Downey, California. I believe that elected officials need to be aware of all of these locations that can potentially cause health risks for planning purposes.

- 12) I also want to emphasize that I learned of another site in the media that is in Orange County. The City of Irvine sued an asphalt company due to toxic releases. I don't know if that facility is mapped on the Toxic release page or not. The Southern California Air Quality Management District (AQMD) has a link to that site on this page: <http://www.aqmd.gov/home/news-events/community-investigations/all-american-asphalt>

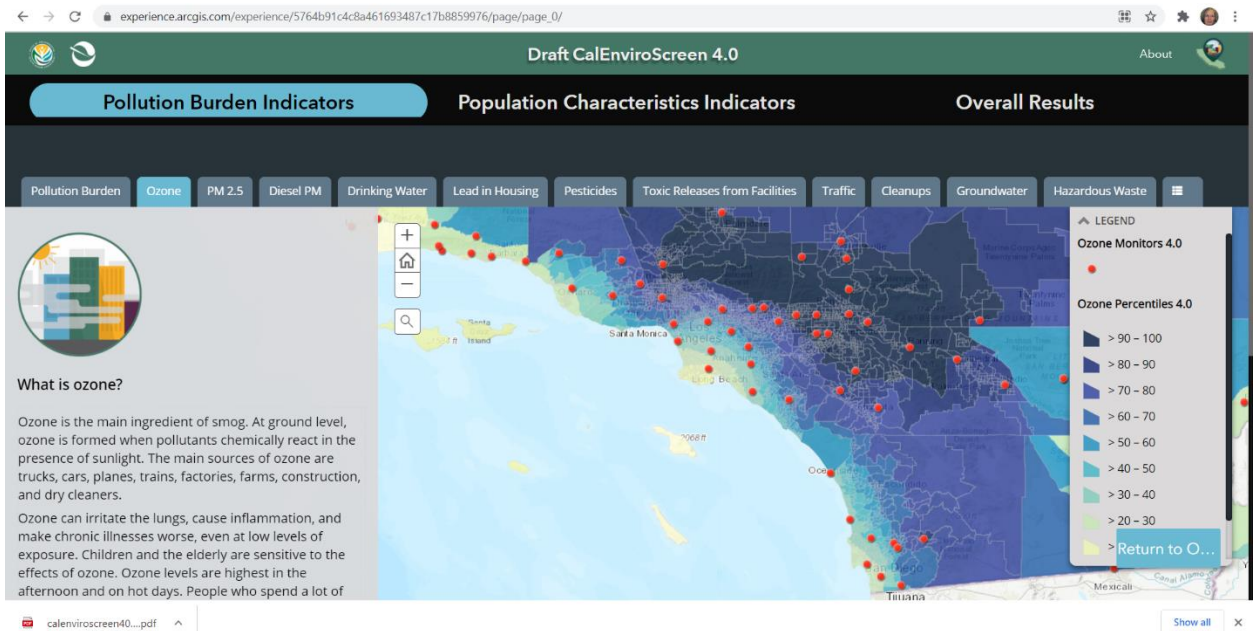
Screen shots for Southern California – CalEnviroScreen 4.0



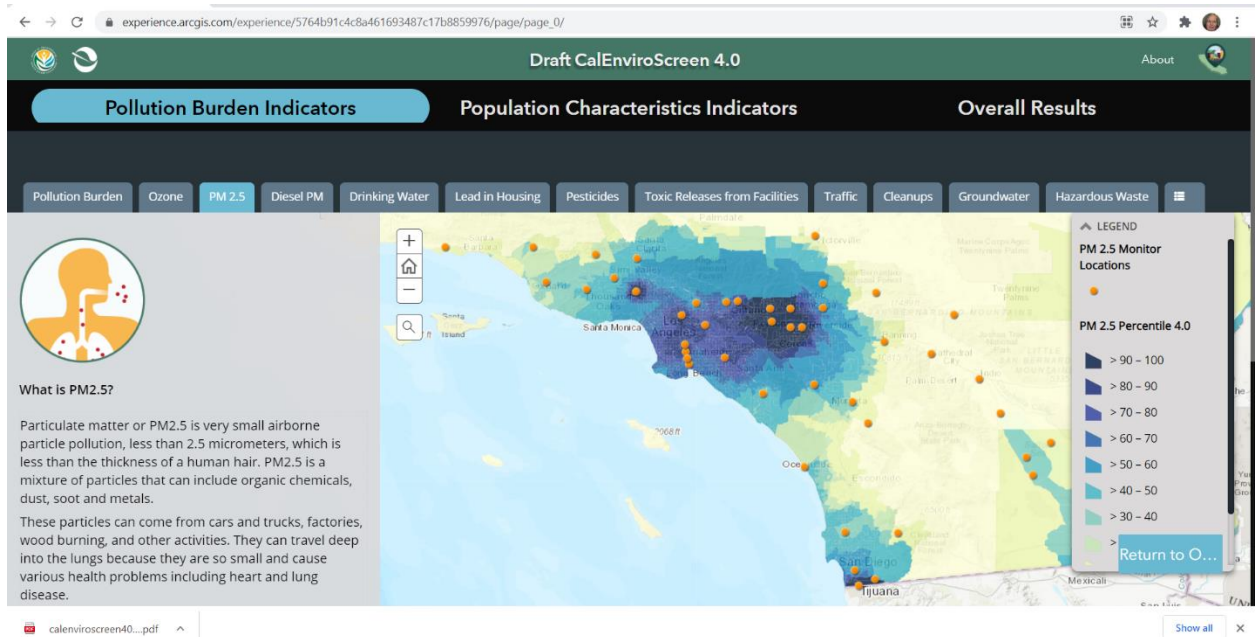
This is the overall results screen shot for Southern California



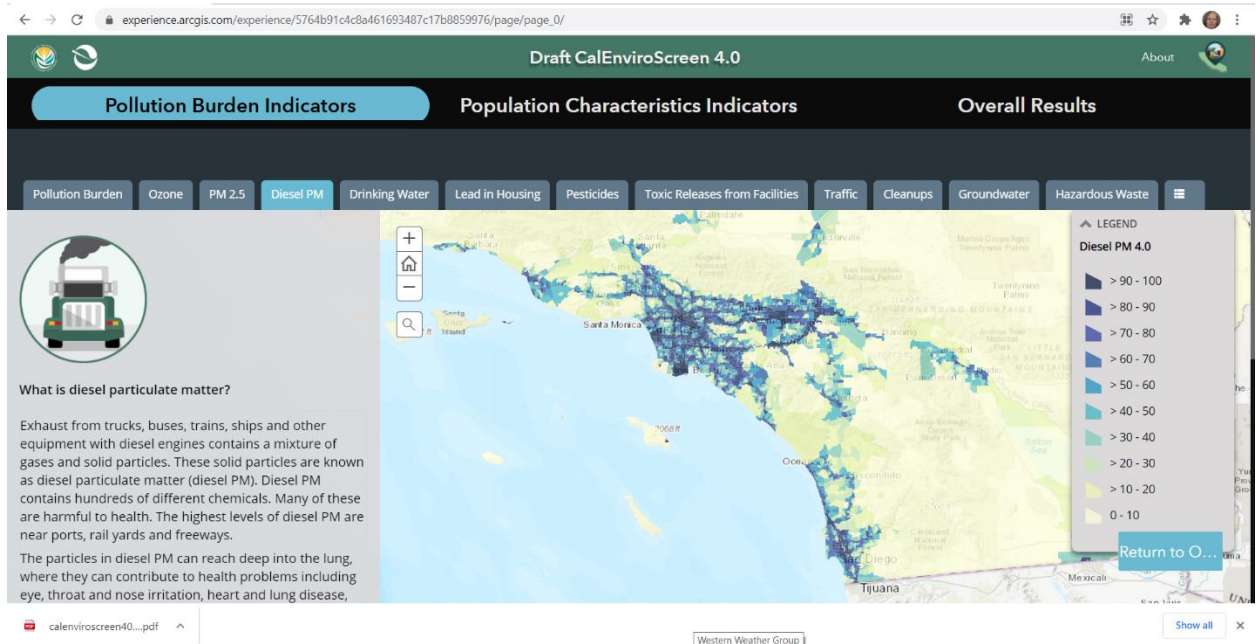
This is the overall Pollution Burden for Southern California. You can see generally a cluster of overall pollution burden from orange county north to roughly the eastern portion of Ventura County on this map.



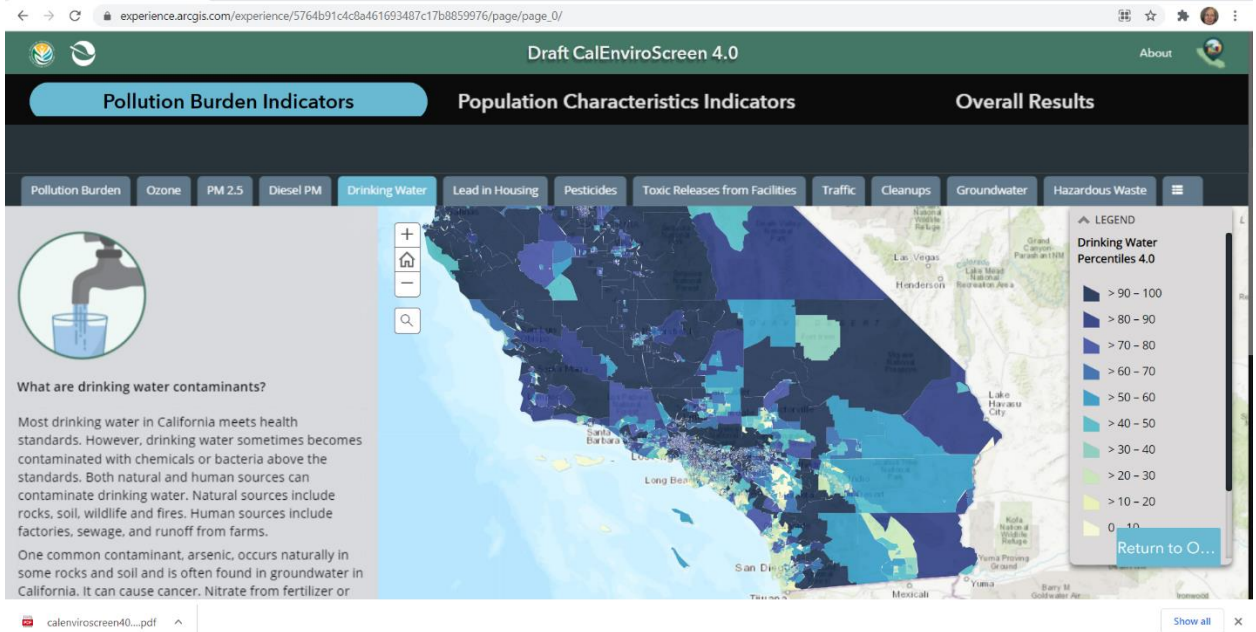
This map shows me that Ozone for the Southern California area is more pervasive in the Eastern Los Angeles area moving to Riverside and other counties.



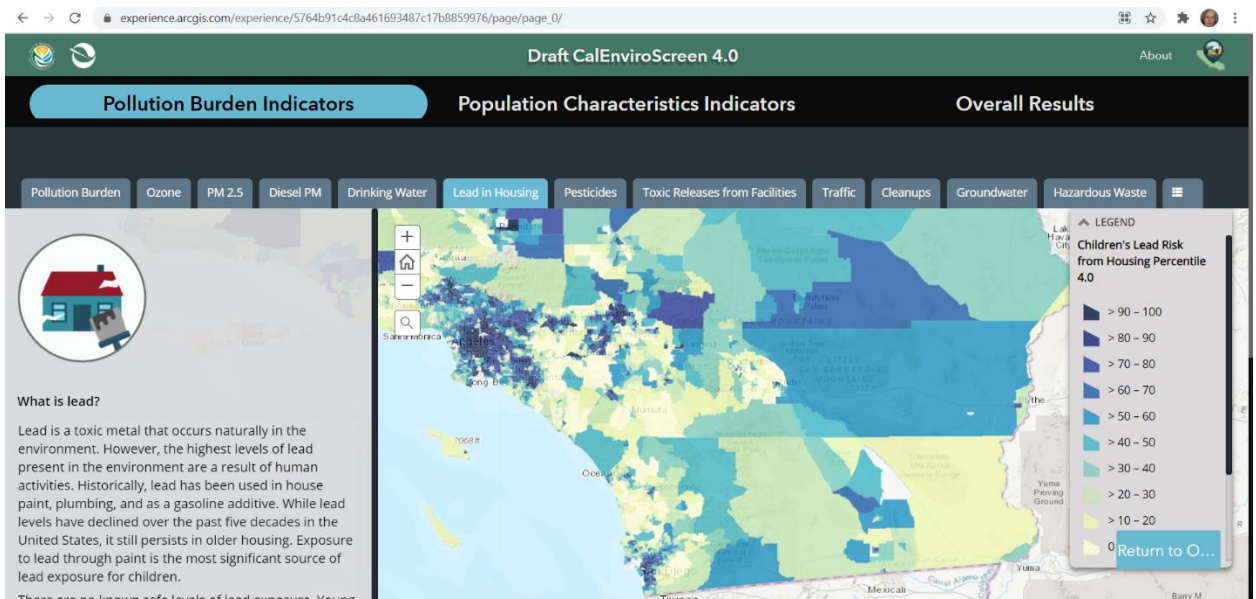
This map shows me that the PM 2.5 is more elevated both near the Tijuana border and to the east of Los Angeles desert area from about LaVerne going east. I believe that may be more in the Riverside County area?



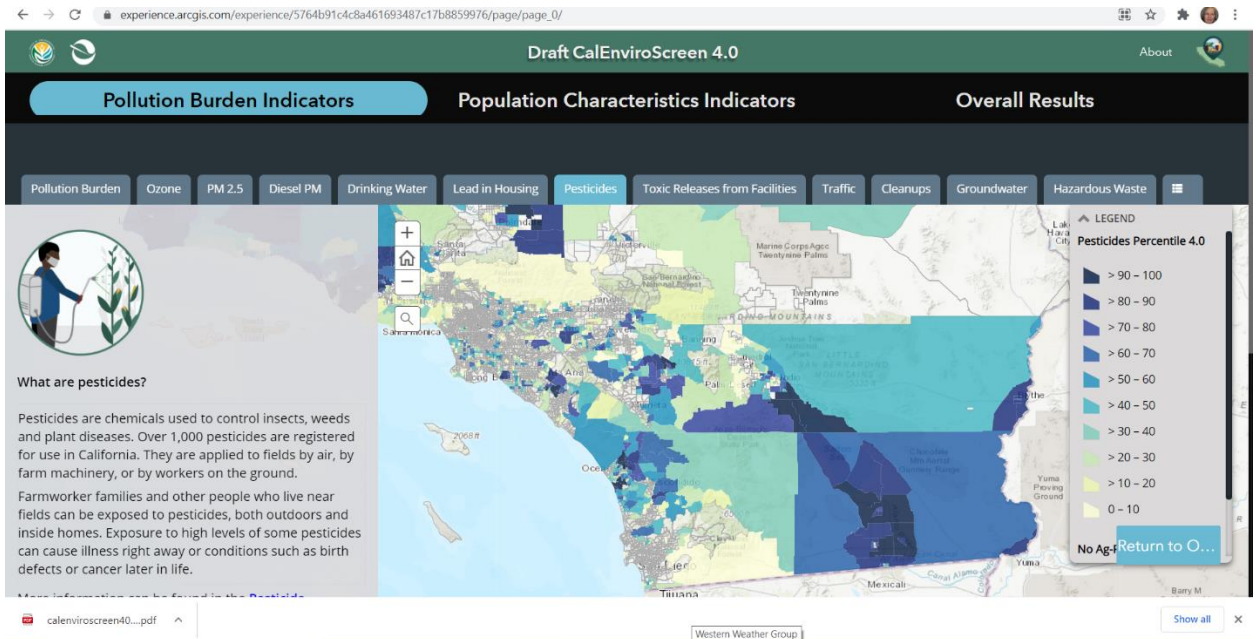
This map shows Diesel PM in expected locations throughout Southern California along the freeway systems.



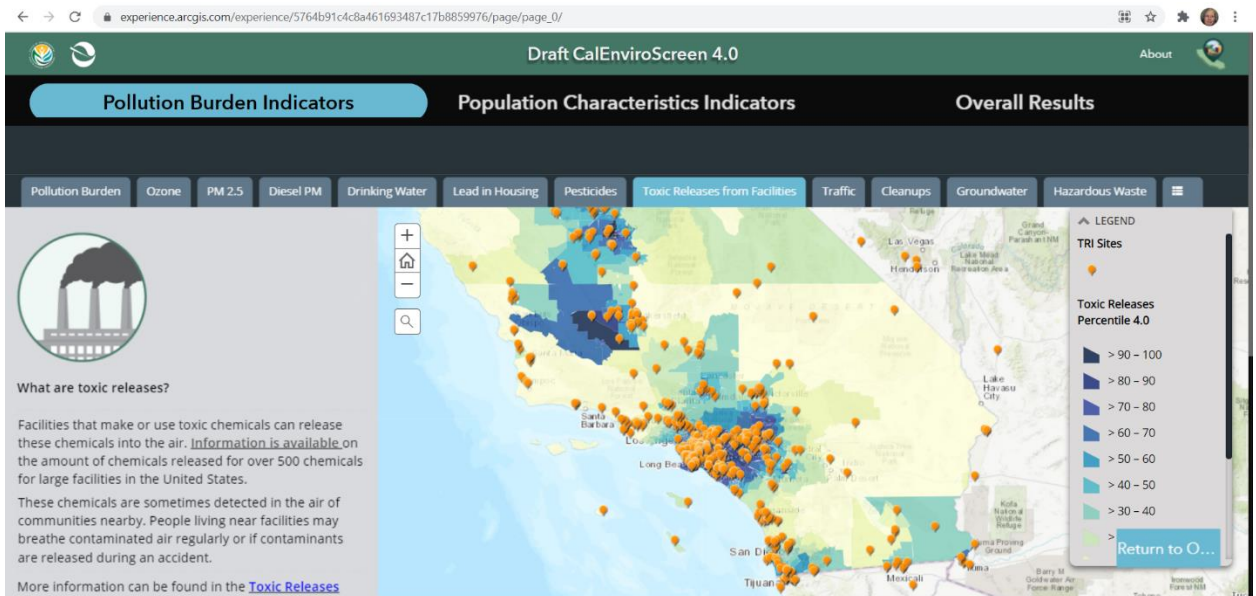
This map shows Drinking water levels of contamination throughout Southern California. While I recognize that contaminants like arsenic are naturally occurring in some areas, and that even some forms of perchlorates can be naturally occurring or are found in fertilizers, as I will show in areas closer to me, I question the sources of some of the contaminants.



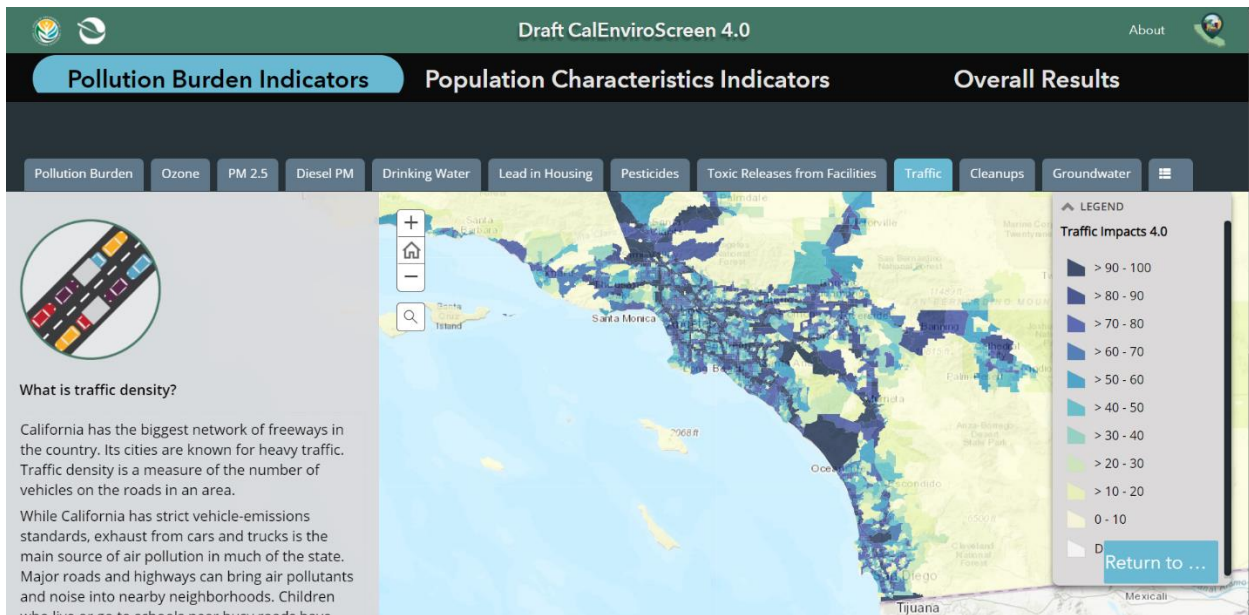
Lead in housing. It is interesting to note that this is found more in the area of Los Angeles and in areas west of there. I will make further comments on this issue when I show screenshots closer to where I live.



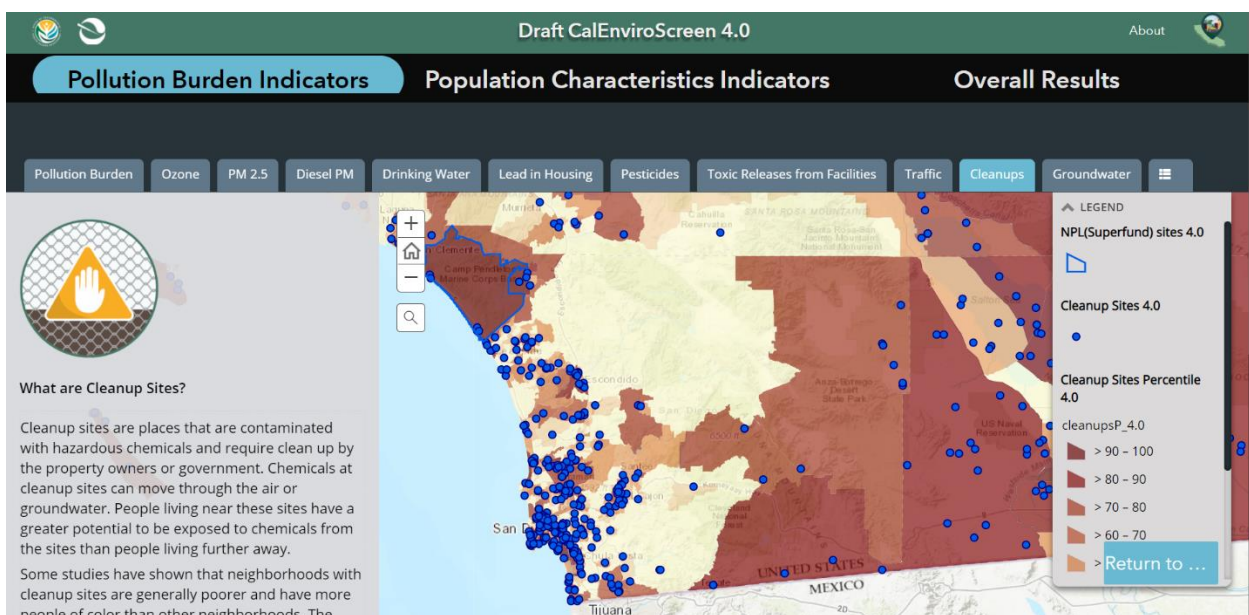
Pesticides in Southern California. It was interesting to see the use of them more to the south east portion of California and also to the north and west towards Ventura County and possibly Kern County.



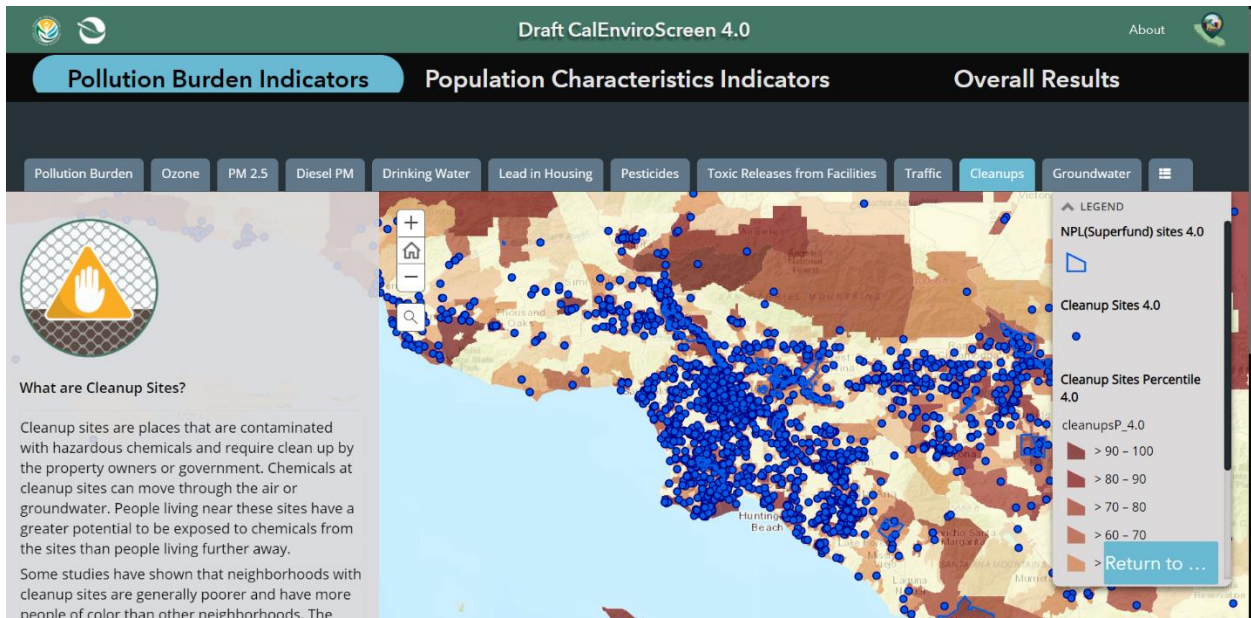
Toxic Releases from facilities. It was surprising to see so many toxic facilities with releases clustered from the border with Mexico north to Orange County and also clustered in the Los Angeles area to Santa Barbara and even further north.



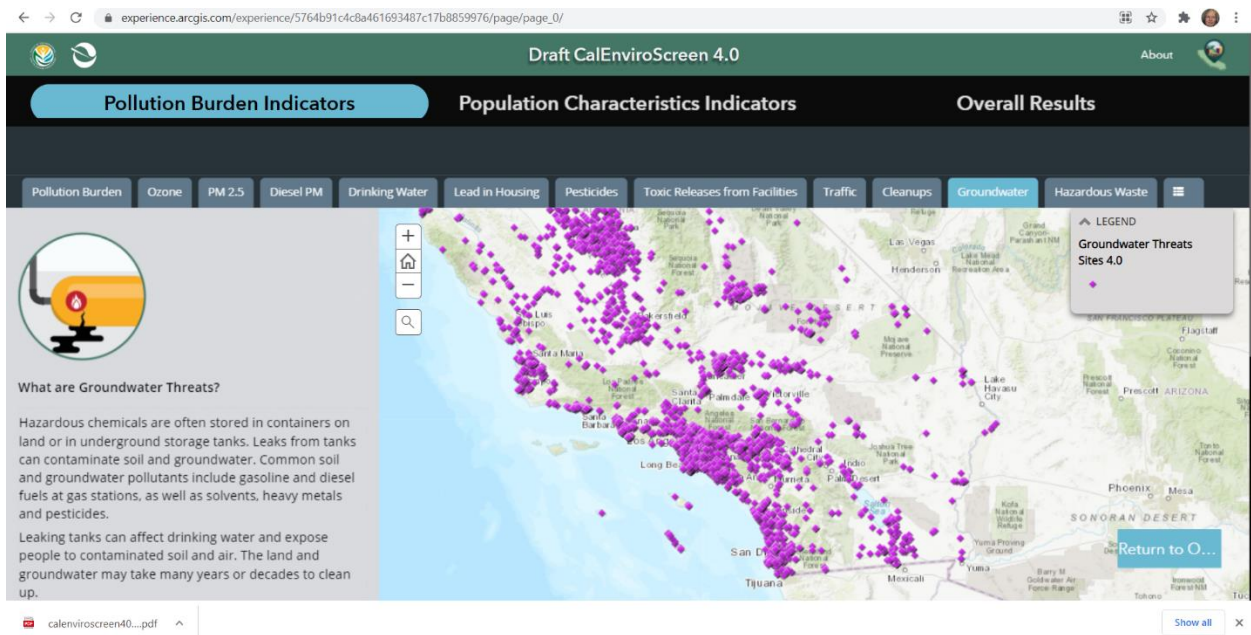
Traffic Density – it was interesting to see the traffic density scores, but most interesting to see the high score around the Camp Pendleton military base. It is not clear to me why that would be.



Cleanup Sites – I found that I could not see all of Southern California for Cleanup Sites. I could only see the sites between the Mexican border to Camp Pendleton and some to the east. Of course the legend hides some these sites.

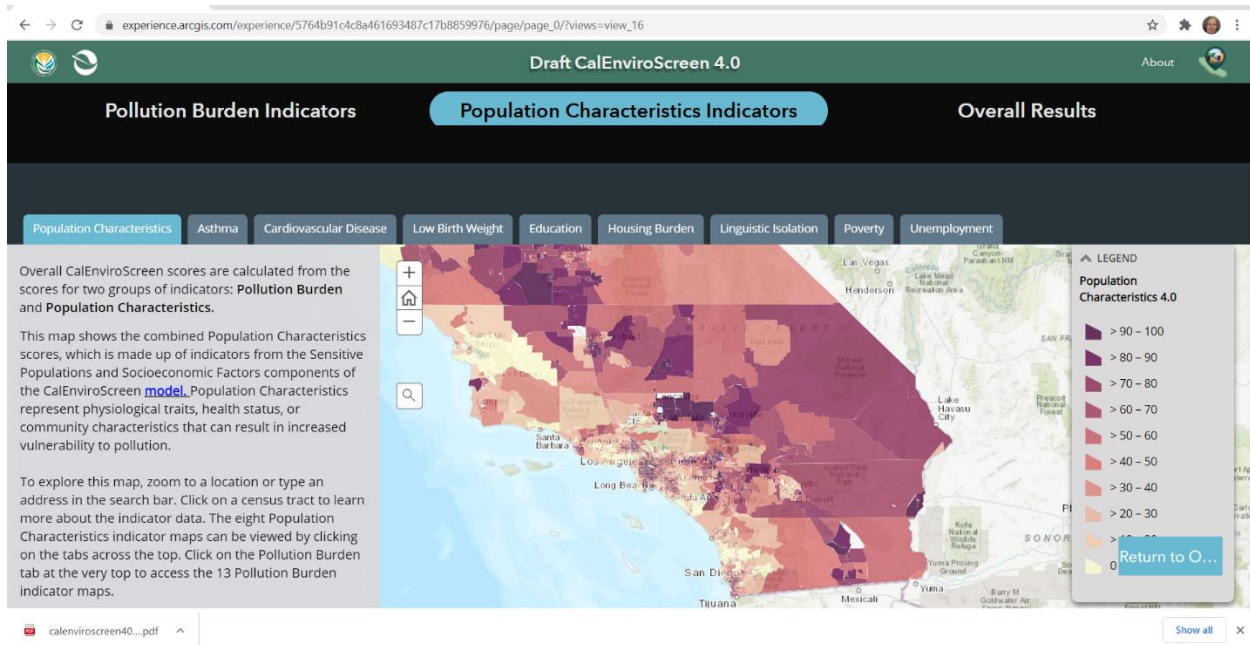


Cleanup Sites – this map represents sites from Orange County north to Los Angeles and to Riverside Counties and as far north as Ventura County. It is surprising to see how many cleanup sites that there are just in Southern California.

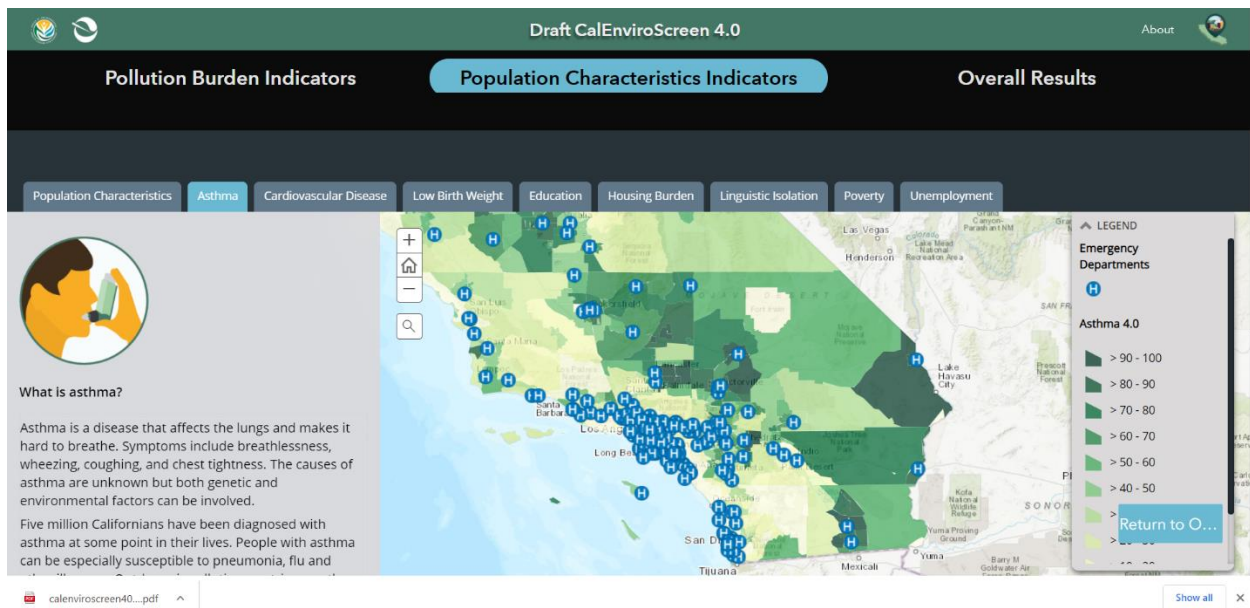


This map reflects Groundwater locations. I recognize that these locations can include leaking Underground Storage Tanks (USTs) to wider spread groundwater contamination from facilities of an industrial nature. This map shows these sites from the border with Mexico to the Central Valley. It is interesting to see the clustering of these locations along the whole San Diego, Orange, and Los Angeles County borders with the ocean.

POPULATION CHARACTERISTICS

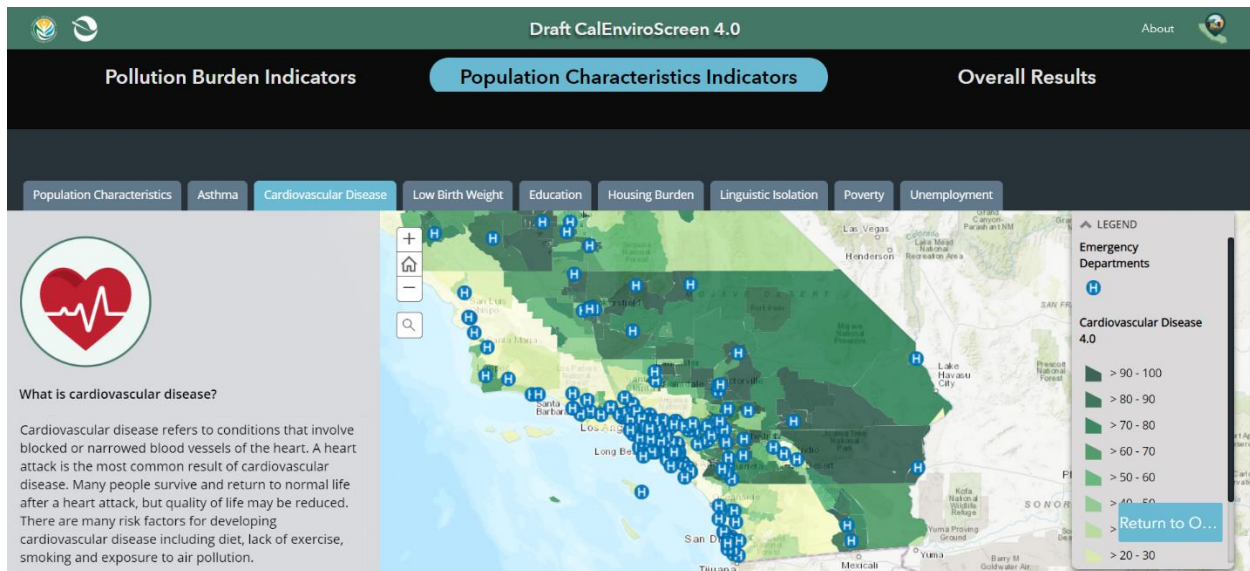


This map reflects the overall Population Characteristics for Southern California. In looking at it on the actual tool where it is enlarged, it is interesting to see the greater population scores in the southern portion to the Nevada border, the downtown area of Los Angeles, Los Angeles County to the north near Palmdale and Lancaster. Other dense areas with these total characteristics are more noticeable in the Central Valley.

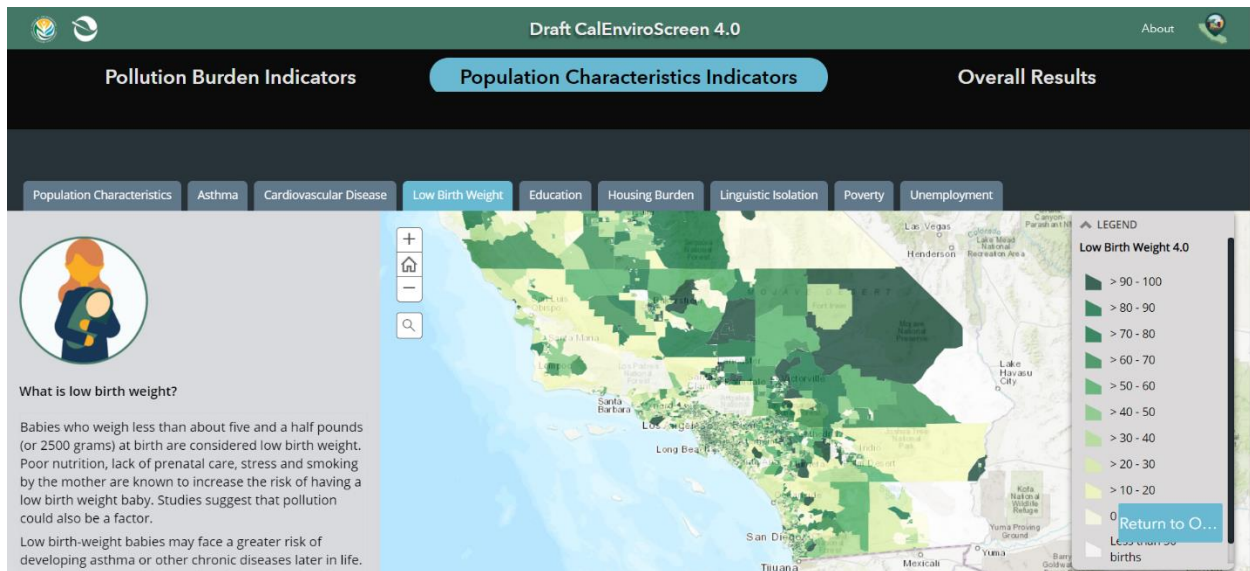


Asthma – I found it hard to read this map because parts of the coastal communities were covered by the density of the hospitals in the coastal region. It was interesting to see the high

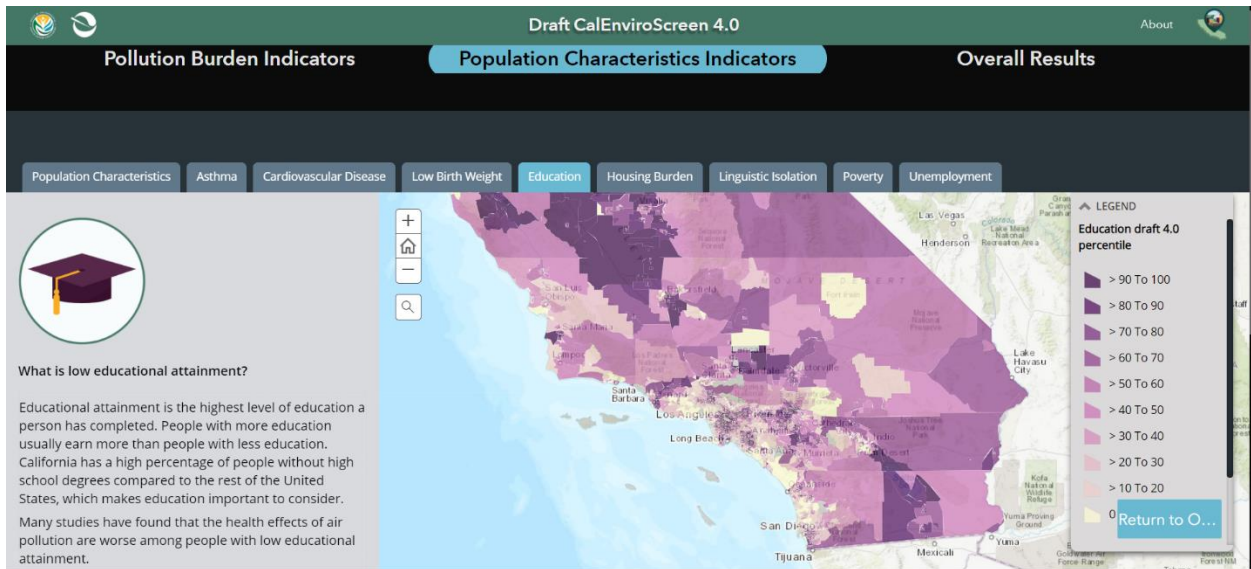
rates of asthma to the eastern boundary with Nevada with only one mapped hospital location in that area.



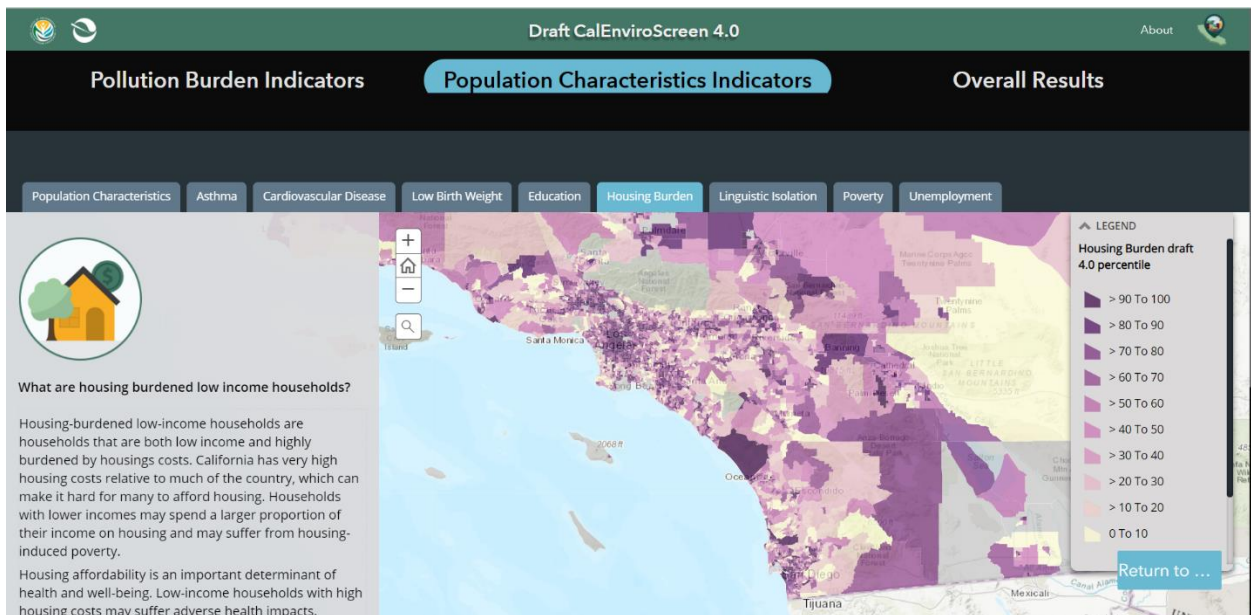
Cardiovascular disease. Again, on this screen shot, the areas of cardiovascular disease for Southern California are partly obscured by the hospitals that are mapped. But it is particularly interesting to note the high incidence of cardiovascular disease to the east near the Twenty Nine Palms area, the Joshua Tree area, and in San Bernadino County.



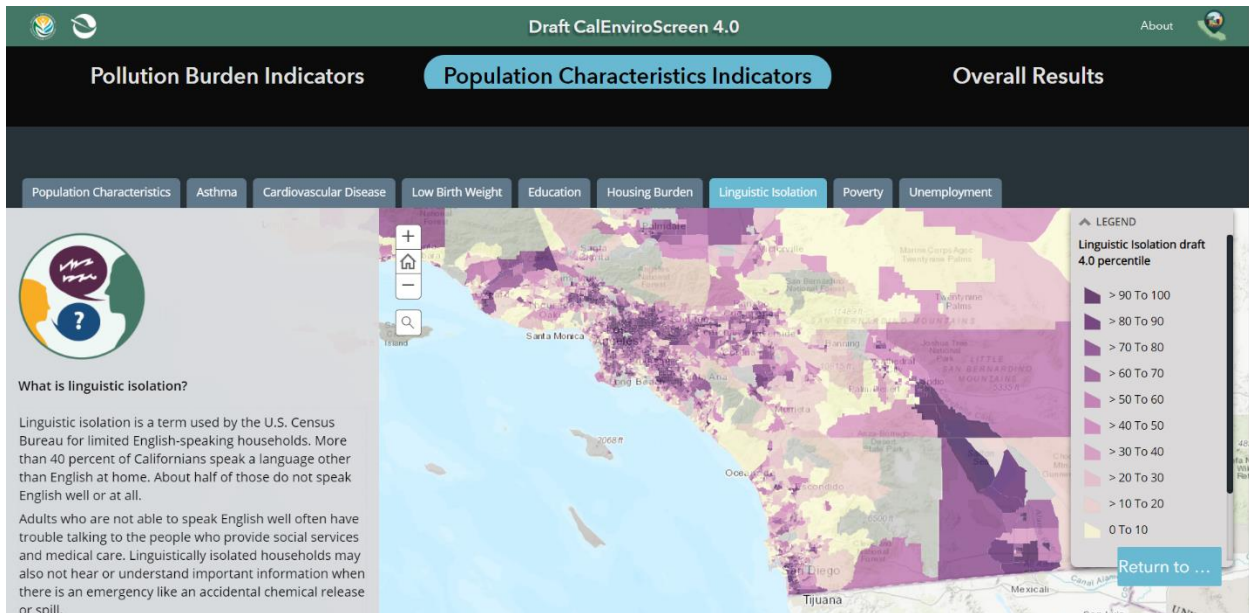
Low Birth Weight – Southern California. It is interesting to note that the low birth rate area is very high in the Mohave Desert area.



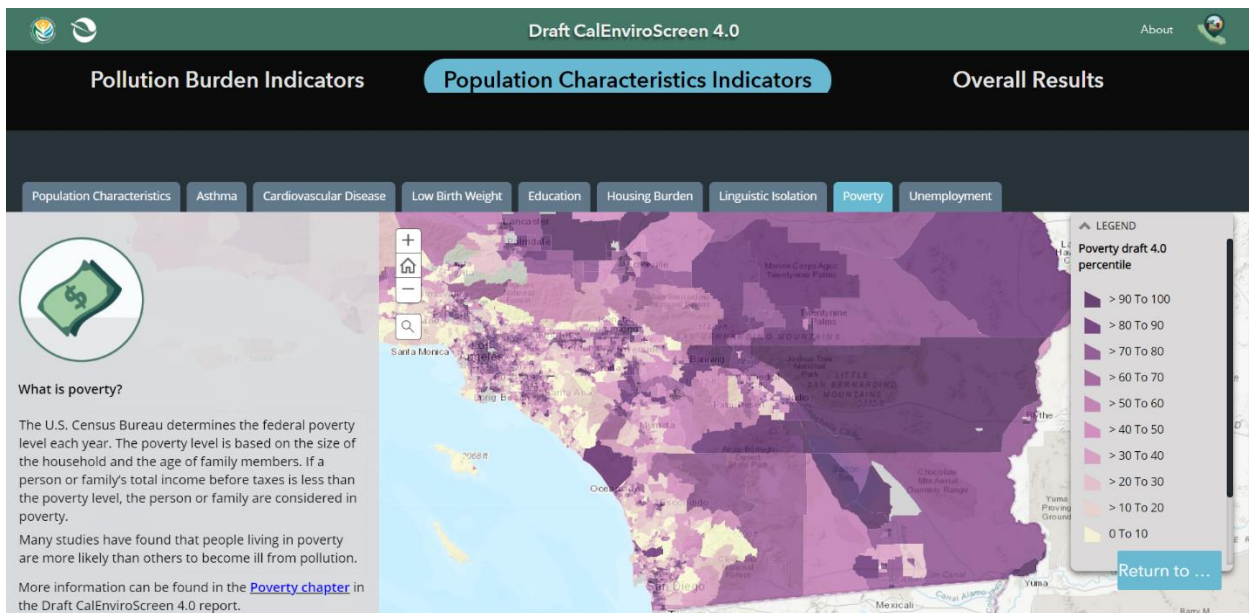
This map reflects the Low Educational Attainment. It is particularly interesting to note that as high both near the border with Mexico in the central area as well as to the north particularly in the Central Valley. I would assume that both of these communities have a lot of migrants that farm in these areas?



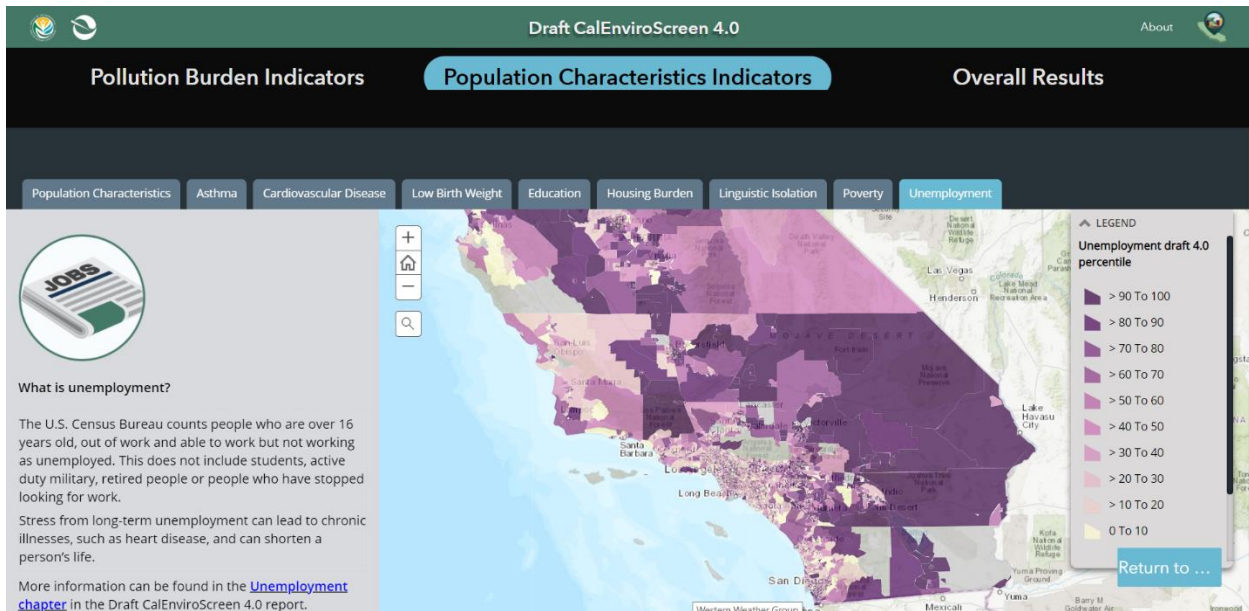
Housing Burden for Southern California. It was particularly interesting to see this so high around Camp Pendleton. It is also noticeable when you look at downtown Los Angeles as well as in the Palmdale east area moving towards San Bernadino County.



Linguistic Isolation – it is interesting to see that at such high levels from the Southern end of the state along the Salton Sea area. It is also possible to see these areas when you enlarge the Los Angeles area going east and north including into the West San Fernando Valley.

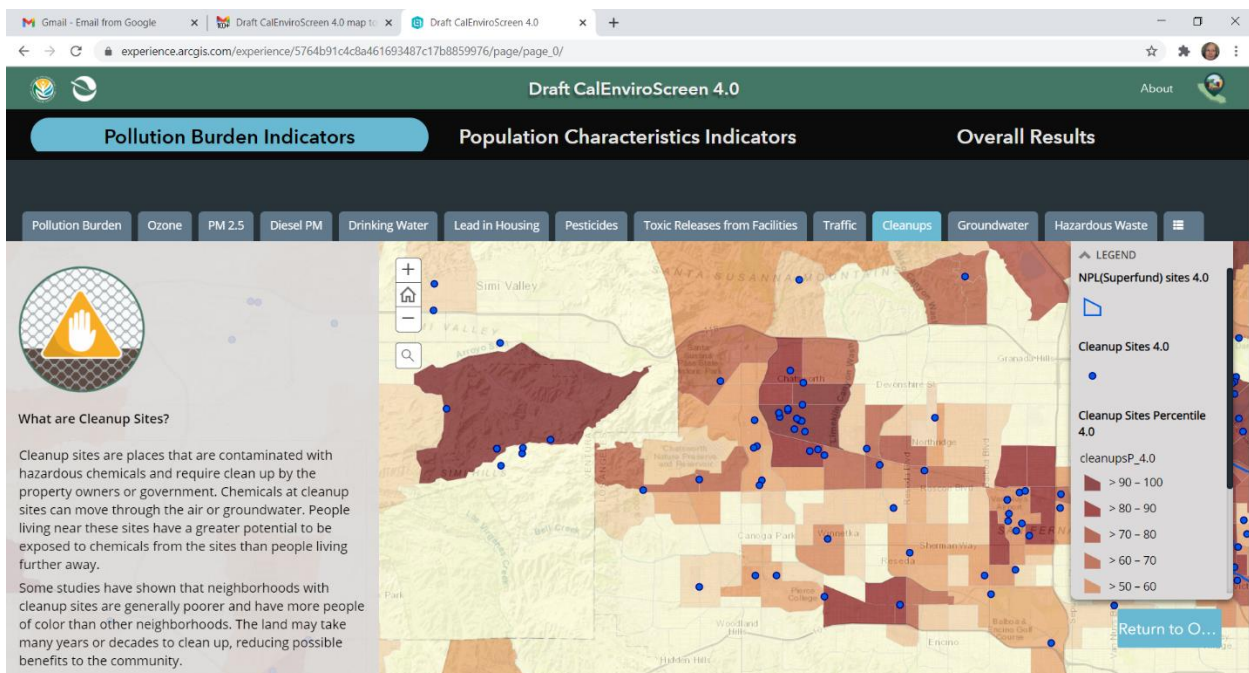


Poverty – as a 43 year resident of the West San Fernando Valley, I was unaware of how pervasive poverty is both in the Camp Pendleton area, but also to the east with most of San Bernadino County showing as having one of the highest levels of poverty. Other areas include the Palmdale east area and the Twenty Nine Palms area as well as north to Kern County.



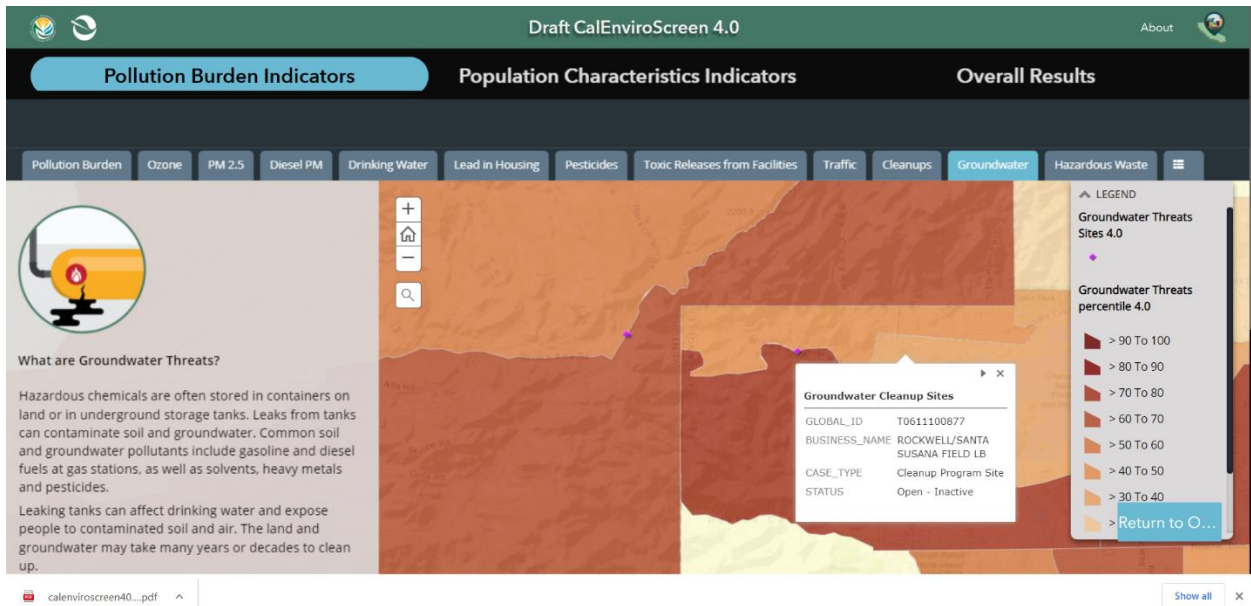
Unemployment – It is hard to believe that such large areas of Southern California can be in the 90 – 100 percentile area for Unemployment. I have to wonder when this data was compiled – is it recent data that reflects the 2020 – 2021 year?

Local issues

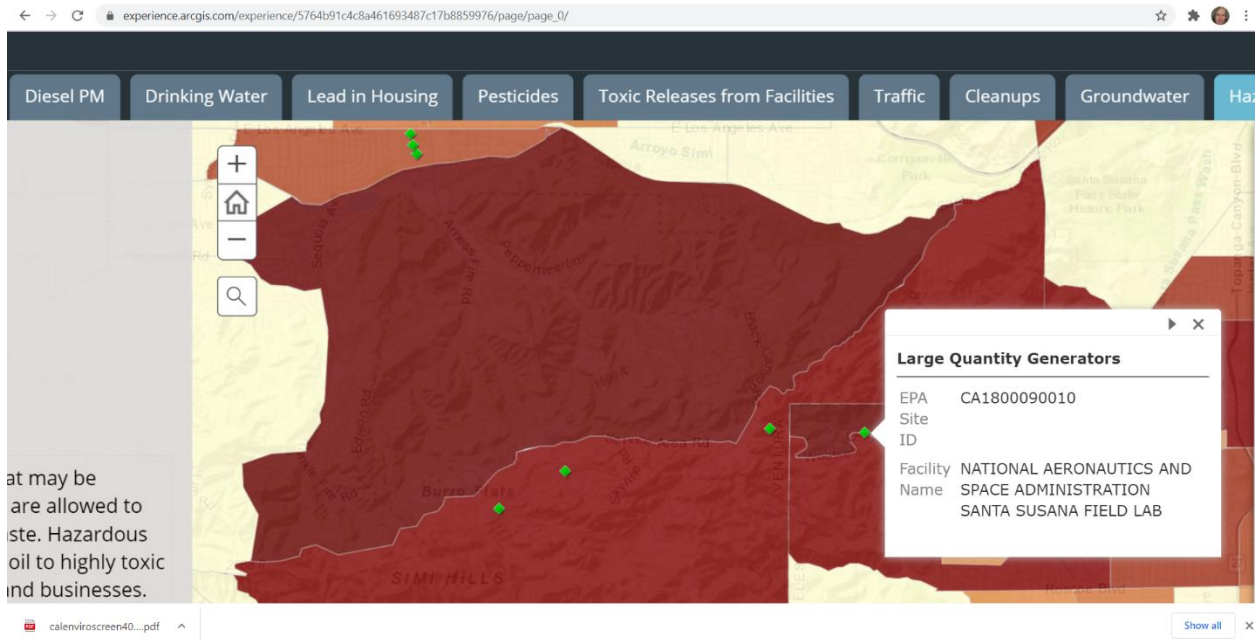


This map reflects the West San Fernando Valley. The large brown figure to the left is one portion of the Santa Susana Field Laboratory. This is the northern parcel and

it represents cleanups. It is my opinion that the portion that needs cleanups is in the southern parcel.



This map shows ground water threats that are supposed to represent Rockwell / Santa Susana Field Laboratory. But in fact, the mapped census tract is to the east of the site, and I believe that the address that is being mapped is the mailing address at 5500 Woolsey Canyon Road, Canoga Park. This marker should be changed in my opinion to relocate the site to the SSFL property. I do not believe that the groundwater has migrated this far offsite according to DTSC presentations.



This is on the Hazardous Waste section. This map shows a marker in a different census tract for NASA SSFL. It is not inside the boundary of the SSFL property from what I can see? It reflects a completely different census tract that I have not seen before – possibly along the Woolsey Canyon Road area? It is not clear when the map is enlarged. This locator should also be changed in my opinion.

Due to the deadline of May 14, 2021, I am concluding these submissions. I will submit other comments after the deadline.

Respectfully submitted,

Christine L. Rowe

6732 Faust Ave

West Hills, California 91307