

RESPONSES TO MAJOR COMMENTS ON THE CALENVIROSCREEN 2.0 PUBLIC REVIEW DRAFT

The Office of Environmental Health Hazard Assessment (OEHHA) and the California Environmental Protection Agency (CalEPA) released a public review draft of the California Communities Environmental Health Screening Tool Version 2.0 (CalEnviroScreen 2.0), on April 14, 2014. Public comments were received at several of workshops held in different parts of the state and in written submissions. The table below summarizes the major comments received and our responses to them. Comments were paraphrased and grouped into broad categories. The final version of CalEnviroScreen 2.0, which was released in August 2014, reflects the many comments received. The report and results are available at <http://www.oehha.ca.gov/ej/ces2.html>.

No.	Category	Comment	Response
1.	General	Include formulas as well as values in downloadable data.	The programming code used to calculate the scores is available upon request.
2.	General	Incorporate data from local or regional entities and local knowledge regarding environmental health threats.	CalEnviroScreen was developed for use by CalEPA for statewide screening, so presently the tool is limited to indicators for which we have statewide data. We may explore regional analyses in the future, which could include more local or regional knowledge.
3.	General	Conduct an analysis of the missing and unreliable data and find alternative sources.	We have looked at data gaps in CalEnviroScreen and will continue to explore methods to gather additional data in future.
4.	General	Thanks for the commitment to create a comprehensive tool to address cumulative impacts.	Comment noted.
5.	General	Supports the use of census tracts in CalEnviroScreen 2.0 because it provides better characterization of disadvantaged communities.	Comment noted.
6.	General	Supports inclusion of drinking water and unemployment indicators and hazard proximity analysis.	Comment noted.
7.	General	Appreciates the effort to incorporate environmental burdens on tribal lands.	Comment noted.

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8.	General	Include race/ethnicity profiles with pollution burden scores for the CalEnviroScreen 2.0 update.	OEHHA has conducted an analysis of the race/ethnicity profiles as it relates to Pollution Burden scores. While these results have not included in the updated analysis of race/ethnicity and the final CalEnviroScreen 2.0 scores, the patterns seen in the results are largely the same.
9.	General	Add "potential" to all mentions of exposure and pollution burden.	The exposure and environmental effects indicators we have selected relate to exposure or potential exposure. In the absence of direct measures of exposure we have chosen the best available data. In this we were advised by experts from the U.S. Environmental Protection Agency, the Department of Toxic Substances Control, CalRecycle and the Department of Pesticide Regulation. Acknowledgment that indicators reflect "potential" exposures has been included in multiple places in the report.
10.	General	Maps should clearly indicate census tracts with zero population.	CalEnviroScreen scores are not calculated for census tracts with low populations (<50 people). These census tracts are indicated in the online maps by the absence of color over the area. Low population census tracts with relatively high pollution burden, however, are indicated with cross-hatching.
11.	General	The Air Resources Board (ARB) should install more air pollution monitors.	Comment noted and provided to ARB.
12.	General	CalEnviroScreen 2.0 overestimates impacts in rural areas.	We disagree with this statement. Thirteen percent of census tracts in the state are rural. Among the top 20% of census tracts identified by CalEnviroScreen, 11% are rural.
13.	General	Tool is biased against urban areas where better spatial data are available.	We have not found that CalEnviroScreen is biased against areas in which census tracts are smaller or where better data are available. Different types of environmental hazards occur in urban and rural areas. The combination of indicators used in CalEnviroScreen is suitable for statewide comparisons.

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14.	General	Concern about multiple indicators measuring the same or similar concerns (double- or triple-counting).	Each of the CalEnviroScreen indicators makes a unique contribution to the overall CalEnviroScreen score. For example, ozone and PM 2.5 are regional air quality indicators while diesel PM is a more localized issue. There are sources of PM 2.5 in regional air that are not traffic-related and there are impacts from traffic that are not fully captured by the diesel PM indicator. Further, disadvantaged communities are often located close to high traffic corridors and in places with relatively high diesel exhaust emissions. While there are correlations between some of the socioeconomic indicators, they have all been included in CalEnviroScreen to address different aspects of vulnerability. Other Population Characteristics indicators such as the prevalence of children/elderly and the rate of asthma emergency department visits do not correlate well with all socioeconomic indicators.
15.	General	Use of CalEnviroScreen could cause redlining and a disincentive for investment in disadvantaged communities.	CalEnviroScreen does not propose any new programs or regulatory requirements, and would not have any impact on existing state and federal laws and regulations prohibiting redlining. The tool identifies areas with varying degrees of environmental burdens and vulnerabilities, and is intended to create a starting point for transformative policies and investment in burdened communities across the state. Pursuant to SB 535, one key use of CalEnviroScreen will be to identify disadvantaged communities for investments from the state’s Greenhouse Gas Reduction Fund.
16.	General	CalEnviroScreen 2.0 misses some communities that face severe pollution impacts. Make sure they are not unfairly excluded due to error or uncertainty.	We are very concerned about the possibility of excluding impacted communities, but thus far we have not seen evidence of this. Earlier evaluations considered a smaller number of indicators and may have identified different communities as impacted.
17.	General	The residents of military bases are not properly represented by CalEnviroScreen because they don’t report their waste and cleanup sites to the state.	All solid waste facilities and some cleanup and groundwater threat sites that occur on military land are incorporated into the current indicators. We will continue to evaluate potential gaps regarding sites that are not incorporated into the state’s databases.

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18.	Indicators: Drinking water	OEHHA has developed the most comprehensive assessment of drinking water data that we have seen to date.	Comment noted.
19.	Indicators: Drinking water	<p>Strongly support OEHHA's use of the Public Health Goal as the metric.</p> <p>Using the Public Health Goal (PHG) instead of the Maximum Contaminant Level (MCL) produces skewed results, particularly for arsenic. Use of a draft PHG is inappropriate.</p> <p>Consider approaches that do not rely on PHG or MCL values.</p>	<p>The drinking water indicator measure has been revised in the final version of CalEnviroScreen to remove indexing to the Public Health Goal values for each contaminant. Instead, the calculated contaminant concentration for each census tract is evaluated in relation to the calculated levels for all the other census tracts across the state by calculating a contaminant percentile. These individual contaminant percentiles were then combined for an overall contaminant index for the selected contaminants (plus MCL and coliform violations -- See below). This change was made for several reasons:</p> <ul style="list-style-type: none"> • Many Public Health Goal values, particularly carcinogens, are well below the limit of detection for reporting (DLR). This produces high ratios at calculated contaminant levels just above the DLR, but zeroes for levels below reporting levels that could be just below detection. This was felt to introduce calculation artifacts unnecessarily that could skew results. • Combining indices for individual contaminants produces an overall value that simpler to communicate compared to the combined concentration to PHG ratios proposed in the draft CES 2.0 methodology. • Ranking each contaminant individually before combining allows OEHHA analysts to more rapidly identify which contaminants are driving the score for any particular census tract. <p>In the draft version of the drinking water indicator, census tract scores were increased if they contained drinking water systems with Total Coliform Rule (TCR) violations. In this final version, violations of chemical contaminant MCLs and TCR violations were each indexed individually and combined with the other chemical</p>

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			contaminant indices to produce the overall drinking water contaminant index.
20.	Indicators: Drinking water	Include 1,2,3-trichloropropane (1,2,3-TCP) as a drinking water contaminant.	<p>Another change to the draft methodology for the calculation of the drinking water contaminant index was to reduce the number of contaminants evaluated. Because of the change to indexing and combining individual contaminants, the influence of more rarely tested and rarely detected contaminants on scoring was considered significant. In the current method, the number of chemical contaminants has been reduced from 18 to 10 based on the frequency of testing, the frequency of detection, the calculated concentration of contaminants and how that calculated concentration relates to levels of concern (PHG, MCL).</p> <p>In the case of 1,2,3-TCP, this contaminant does not yet have an MCL so testing is not required, meaning there are a large number of census tracts with no information on 1,2,3-TCP levels. When detected, level are also generally below concentrations of concern based on the current PHG value. Thus the chemical was not included in the final drinking water contaminant index.</p>
21.	Indicators: Drinking water	Concern that public agencies and water systems were not consulted in development of drinking water indicator.	We conducted a consultation process with public agencies, including water systems, regarding the development of the drinking water quality indicator. We have worked with them to obtain the most accurate and complete data possible.
22.	Indicators: Drinking water	Appreciate OEHHA's willingness to work with the Los Angeles Department of Water and Power to improve data quality.	Comment noted. Based on this consultation and feedback, substantial improvement has been made to the contaminant measures and final drinking water contaminant index for systems in Southern California.
23.	Indicators: Drinking water	Drinking water indicator doesn't reflect the fact that 98% of Californians receive water that meets all federal standards. Explain that a high water quality indicator score does not mean standards have been violated.	A statement to the effect that most Californians receive water that meets federal standards has been included in the description of the drinking water indicator.

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24.	Indicators: Drinking water	Clearly state the assumptions and limitations inherent in the drinking water indicator and the fact that scores are statewide percentiles.	The supporting documentation on the drinking water quality indicator that we have released to accompany the CalEnviroScreen report identifies many of the assumptions that were made and uncertainties that are part of development of the indicator.
25.	Indicators: Drinking water	It appears from media coverage to date that the drinking water indicator results will be used separately from the total CalEnviroScreen score.	Our focus is on the total CalEnviroScreen score. In the interest of transparency, the data for each indicator that was used to calculate the CalEnviroScreen score for each census tract has been made available to the public, including the media.
26.	Indicators: Drinking water	Recommend that the drinking water indicator be removed from CalEnviroScreen 2.0 until data quality issues are resolved.	We have considered this recommendation and have made a number of improvements to the drinking water indicator.
27.	Indicators: Drinking water	Inclusion of raw water data produces incorrect results. Most groundwater is treated before delivery. CalEnviroScreen should not imply that drinking water in agricultural areas is contaminated.	"Raw water" monitoring data were only used if treated or untreated water monitoring data for a particular chemical was not available for a system. The use of "raw water" refers to the labeling of the testing locations by CDPH and does not necessarily indicate whether water is treated for all chemicals.
28.	Indicators: Drinking water	Recommend excluding trihalomethanes (THMs), lead and total coliform. Pesticides in drinking water should not be considered carcinogens.	We identified the contaminants based on frequency of testing, detection, and toxicity concerns. Numerous violations of the THM MCL and Total Coliform Rule have occurred in water systems across California. Designation of carcinogens and non-carcinogens is based on published reports. In the final version of the drinking water indicator methodology, carcinogens and non-carcinogens are not grouped separately.
29.	Indicators: Drinking water	Monitoring intervals vary with water source and type of contaminant. Trace metal contaminants should be calculated differently for groundwater and surface water sources. THM data are specific to time and place of sample collection. Indicator needs to take this into account.	We used a time-weighting approach to address differences in monitoring intervals and chose a 9-year interval covering a complete compliance cycle (3 compliance periods). Most water systems should test for most of the contaminants during this period. We have worked with water system experts to improve our handling of the THM data.

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30.	Indicators: Drinking water	Consider assessing acute and non-acute contaminants instead of carcinogenic and non-carcinogenic.	In the final version of the drinking water contaminant indicator in CES 2.0, contaminants are not separated into carcinogens and non-carcinogens. We will consider the possibility of evaluating contaminants based on whether they cause acute or chronic effects in a future version of the tool.
31.	Indicators: Drinking water	Population weighting can leave out small communities with contaminated water sources.	CalEnviroScreen 2.0 scores relative impacts on the basis of a fixed area, the census tract. The analysis for drinking water quality was based on census tract boundaries rather than those for drinking water systems. The approach to averaging water quality over the census tract based on the population served by systems in the tract is reasonable and permits combining our drinking water contaminant index with the other indicators in CalEnviroScreen. Systems serving small numbers of people make relatively smaller contributions to the tract’s overall drinking water score than larger systems serving more people. So small communities with contaminated drinking water will contribute to the tract’s drinking water score, though that contribution may be small.
32.	Indicators: Other	<p>Include one or more of the following:</p> <ul style="list-style-type: none"> • Substandard infrastructure • Pedestrian safety • Wastewater and sanitation • Availability of public transit • Housing quality • Housing vulnerability • Affordable housing • Access to medical care • Proximity to services – employment centers, retail, full-service grocery stores • Subsistence fishing • Climate change • Single parent households • Community assets • Chronic disease 	We will make an effort to explore and consider additional indicators in future versions of CalEnviroScreen. Some of these proposed measures relate to the built environment, which is not currently a discrete component of CalEnviroScreen. Others relate to specific types of vulnerability, which will be considered and possibly developed in the future.

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33.	Indicators: Pollution Burden	Clarify the ways in which data from tribal lands are incorporated.	Language has been added describing how the additional data on sites/facilities on tribal land were incorporated.
34.	Indicators: Pollution Burden	Include land use and water quality data and threats to groundwater from sites on tribal lands.	We have incorporated information that is currently available to us. We will continue to look for ways to include additional data regarding conditions on tribal lands that do not appear in state or federal databases.
35.	Indicators: Pollution Burden	Consider including data on dairies and Confined Animal Feeding Operations (CAFOs) as a component of air quality and groundwater threats.	In future updates to CalEnviroScreen, we will look into the availability of reliable data to characterize impacts of dairies and CAFOs on different parts of California for possible incorporation into the tool.
36.	Indicators: Pollution Burden	Review the spatial scale for each ARB air quality monitor and reduce the radius based on presumed accuracy rating. Consider excluding air quality indicator scores where there is a shortage of monitoring locations.	We exclude monitoring stations with unreliable data and census tracts that are further than 50 km from air quality monitors. In the case of PM2.5, the modeling of the air monitoring data has been adjusted to increase the influence of nearby monitors.
37.	Indicators: Pollution Burden	PM 2.5 and diesel indicator data do not adequately reflect air quality in East Coachella Valley.	We would like for the data used in CalEnviroScreen to accurately reflect the conditions in different parts of the state. The air monitoring data currently included in CalEnviroScreen are the most reliable statewide data that is available. We will continue to evaluate the possibility of incorporating additional data that might result in better characterizations of the Coachella Valley in future versions of CalEnviroScreen.
38.	Indicators: Pollution Burden	CalEnviroScreen does not include a way to capture events such as fires or unexpected releases from facilities.	We acknowledge this limitation and will look for ways to incorporate information on fires and unanticipated toxic releases in the future. We discuss this issue in the report.
39.	Indicators: Pollution Burden	Cleanup and waste site weights include perception of impact, but other industrial activities do not.	We worked with CalEPA boards and departments to estimate the relative magnitude of the potential impact of sites based on criteria such as waste volume, hazardous nature of materials and size. We used this information to determine weights for different types of sites.

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40.	Indicators: Pollution Burden	A permitted waste facility or cleanup site will not have any impact at a distance of 1000 meters. Waste facilities are highly regulated and therefore safer than other less well-regulated activities.	We agree that waste and other types of facilities are regulated with the intent of reducing or eliminating potential impacts to neighboring communities. For the purpose of scoring communities in CalEnviroScreen, we chose to reduce the contribution of facilities that are far from where people live, including facilities that are regulated such as landfills and other disposal sites.
41.	Indicators: Pollution Burden	There is no clear rationale for the weighting factors chosen for hazardous waste sites.	The weighting factors were developed in consultation with experts at the Department of Toxic Substances Control. The factors were based on type of facility, its size, the type of waste that is handled (RCRA waste vs. non-RCRA waste), and how recently the facility was permitted.
42.	Indicators: Pollution Burden	Consider counting clusters of small hazardous waste facilities as if they were one large facility.	We feel that the current method of summing all the hazardous waste facilities in or near a census tract addresses this concern.
43.	Indicators: Pollution Burden	All solid waste facilities, regardless of size, should be measured using area polygons or facility boundaries.	We have received additional boundaries for many solid waste facilities from CalRecycle and have incorporated them into the indicator calculations.
44.	Indicators: Pollution Burden	Include illegal dump sites in solid waste site indicator.	CalRecycle has a database of illegal dumpsites. We have included these Priority A and B sites in the solid waste indicator. (http://www.calrecycle.ca.gov/swfacilities/cia/).
45.	Indicators: Pollution Burden	Add a distance adjustment to toxic release scores rather than using the EPA plume model (RSEI).	The toxicity-weighted RSEI data is the preferable available model for this indicator as it incorporates important factors such as meteorology and stack height.
46.	Indicators: Pollution Burden	Toxic Release Inventory (TRI) data includes land disposal at permitted facilities, which should not be counted as a release.	The toxic releases indicator includes only releases to air.
47.	Indicators: Pollution Burden	TRI only captures facilities with ten or more employees that operate within specified industrial sectors and manufacture or use more than a specified amount of chemicals.	We realize that there are limitations to TRI data, including the thresholds for which facilities are required to report. Here we are relying on well-established databases and models.

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48.	Indicators: Pollution Burden	Pesticide use is not equivalent to pesticide exposure.	We have provided evidence that exposure does occur in places where there is high pesticide use. We agree that use does not equate with exposure. However, we are concerned that relative exposures are likely to be higher where pesticide use is high, especially for the highly volatile pesticides that we have included in this indicator.
49.	Indicators: Pollution Burden	Use county data for non-agricultural uses of pesticides.	We explored this option and found that the county-wide data covered too large an area to be useful in CalEnviroScreen at the census tract scale. We will look for ways to incorporate this important contribution to pesticide use in future versions of the tool.
50.	Indicators: Pollution Burden	Justify and describe the limitations of the methods for toxic releases, groundwater threats and hazardous waste facilities.	The criteria used to weight hazardous waste sites reflect the relative hazards of sites with no or expired permits compared to those whose permits are current. The method by which RSEI analyzes chemical releases and models potential toxic exposures provides the best available statewide information on releases to air from facilities. We will consider incorporating community-level data when they are available on a statewide basis. We will also look into expanding the uncertainty and error section of the report to further discuss limitations of the data and methods.
51.	Indicators: Pollution Burden	Include non-point sources such as septic systems and agricultural discharges in the groundwater threats indicator.	We agree that non-point sources can be important contributors to impact. They are not included because data are not available on a statewide basis. We hope to incorporate such information in a future version of the tool.
52.	Indicators: Pollution Burden	If water bodies pose a threat to communities, the tool should include a larger buffer. Explain the selection of a 2 km buffer for some rivers in the impaired water bodies indicator.	We have included more information supporting our reasoning for buffer size selection in the revised report.

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53.	Indicators: Population Characteristics	Census data are often inaccurate in rural and agricultural regions.	We realize there are uncertainties regarding census data, but it is currently the best data source available to characterize the statewide population. We've made an effort to remove unreliable data from the American Community Survey using the margin of error estimates that are provided.
54.	Indicators: Population Characteristics	Census tracts with large populations of military personnel skew the demographic data.	We will consider options to address this concern. We will evaluate how military data are captured and whether the data or lack of data bias CalEnviroScreen results.
55.	Indicators: Population Characteristics	Age indicator seems to select areas with high populations of elderly rather than those with more children.	We have reviewed the age indicator extensively. We found that inclusion of elderly allowed us to identify vulnerable elderly populations without creating a bias toward the affluent elderly.
56.	Indicators: Population Characteristics	The asthma indicator undercounts prevalence in geographically isolated communities. Weight asthma-related emergency department visits by proximity to nearest emergency department from the center of each census tract.	We understand that limitations of the asthma indicator may occur in areas with limited access to health care. However, we have not identified a way to adjust the rates with confidence. Nevertheless, we appreciate the suggestion and will consider it in the future efforts to improve the indicator.
57.	Indicators: Population Characteristics	Asthma rankings for census tracts with military population are unrealistic. Suggest excluding census blocks within military facilities.	Asthma emergency department visit rates were estimated from the data that are available statewide at the ZIP code scale. The calculation and inclusion of the estimates for census tracts where there are military populations is preferable to excluding such tracts from the overall CalEnviroScreen analysis. We will continue to evaluate the data and potential bias for military personnel in future versions of CalEnviroScreen.
58.	Indicators: Population Characteristics	Asthma indicator lacks precision because the emergency department location isn't necessarily near the residence location.	The asthma indicator uses census tract of residence rather than the location of the hospital emergency department.

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59.	Indicators: Population Characteristics	Eliminating post office box addresses undercounts low weight births in some rural areas.	There is some evidence that post office boxes are more prevalent among rural populations. However, the degree to which this biases the birth outcome data is presently unclear, and we are not aware of a way to adjust for it with confidence. We will consider options for making such an adjustment in future versions of CalEnviroScreen.
60.	Indicators: Population Characteristics	Explain the reason for using of data from 2006-2009 for low birth weight when versions 1.0 and 1.1 used data from 2007-2011.	We were unable to obtain birth weight data at the census tract scale for years later than 2009. We will update the indicator with more recent data in the next version of CalEnviroScreen.
61.	Indicators: Population Characteristics	Revise linguistic isolation indicator to include "communication isolation," which includes access to technology.	We use census data to determine the measure of linguistic isolation. We will explore communication isolation or access to technology as a possible additional factor in the future.
62.	Indicators: Population Characteristics	The poverty indicator should include a cost of living adjustment. Consider using the Self-Sufficiency Standard instead of the federal poverty level.	We have looked into this issue and are unable to find a statewide cost of living adjustment that can be applied at the census tract scale. While the Self-Sufficiency Standard may provide a good basis for determining a household's financial need, a statewide database comparing income to the standard is not currently available. We will continue to look into the possibility of including a cost of living adjustment factor in future versions of CalEnviroScreen.
63.	Indicators: Population Characteristics	Unemployment indicator should account for seasonal employment.	Seasonal employment data are currently only available at the county scale. We will look into the possibility of including data on seasonal employment in future versions of CalEnviroScreen.
64.	Methodology	Discuss tradeoffs between ZIP codes and census tracts.	We have added more discussion of the advantages, disadvantages and differences between the census tract and ZIP codes to the "Summary of Major Changes" document.
65.	Methodology	Compare CalEnviroScreen to EJSM, UC Davis DEVA, and UC Davis Regional Opportunities Index.	This is beyond the scope of the CalEnviroScreen project.

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66.	Methodology	Modify the tool for use on a regional basis. Consider publishing regional ranking maps using regional planning areas and air basins.	CalEnviroScreen is specifically designed for statewide comparisons and does not include data that are only available regionally. The current tool is unsuitable for regional analysis, and would require additional resources to redesign for this purpose.
67.	Methodology	CalEnviroScreen underweights socioeconomic factors and population characteristics.	In the final CalEnviroScreen analysis, we have made a minor adjustment to the way the final scores are calculated. To make the relative contribution of Pollution Burden and Population Characteristics equal, the scores for each of these two groups was standardized to its respective maximum value (i.e., both were adjusted to a 0 to 10 scale). Total CalEnviroScreen scores were then calculated as described in the draft document.
68.	Methodology	Consider combining population characteristics indicators into a single indicator.	The Population Characteristics component combines all of the socioeconomic factors and vulnerable population indicators.
69.	Methodology	Census tracts without population characteristics data should not be used in calculating percentiles for exposure and environmental effects.	We feel that it is valuable to identify all census tracts with high pollution burdens. People may work in areas without residential populations, and sources of pollution may affect neighboring census tracts.
70.	Methodology	Indicators with greater health impacts should receive more weight.	Exposures are weighted more heavily than environmental effects in CalEnviroScreen. We do not have health impact data to adjust the weighting of each indicator individually.
71.	Methodology	It is inappropriate to use regional air quality data to score small census tracts.	Regional air quality data provide important contributions to assessing some aspects of pollution burden. Other indicators, such as diesel particulate matter, capture more localized factors.
72.	Methodology	CalEnviroScreen ozone data for Sutter and Yuba Counties are incorrect. Assign values based on air quality planning area attainment status. [i.e., regional air quality data]	We have relied on statewide air monitoring databases for air quality information rather than regional data. We will look into this further.

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73.	Methodology	The multiplicative method is inappropriate and dilutes the impact of pollution.	A multiplicative method is not uncommon in epidemiologic assessments when evaluating associations between exposures and potential health effects. We have reviewed the scientific literature and found relationships between socioeconomic factors, pollutants, and health outcomes that support this approach.
74.	Methodology	Use of percentiles distorts the results.	The method of ranking communities using percentiles normalizes individual indicator results to some degree and allows them to be combined in a meaningful way. CalEnviroScreen provides a statewide ranking of communities, rather than an absolute measure of impacts or harm.
75.	Methodology	Explore the feasibility of including EJSM's land use methodology.	We will look into this in future versions of CalEnviroScreen.
76.	Methodology	Consider assigning geographically-based data reliability scores for indicators and create a "Data Gaps" indicator.	We already have reliability measures for many indicators and criteria for including or excluding data are available. We have made adjustments to CalEnviroScreen when necessary after working with CalEPA boards and departments to evaluate specific geographic locations for particular indicators.
77.	Methodology	When data are highly skewed, use of rankings as multipliers distorts differences between underlying distributions of the data. Consider ranking the percentiles in reverse order or using a range that does not start with zero, such as 100 to 200.	In scoring individual indicators, we elected to rank census tracts in relation to one another so that the result could be readily understood by the user. Similarly, we are now normalizing the overall Pollution Burden and Population Characteristics scores, both to equalize the weights between those two groups and to provide users with an indication of the relative contribution of each group. We recognize that sometimes the relationship between the raw score for an indicator and its percentile rank is not one-to-one. However, for the time being, we are opting for the simpler method of scoring, rather than an approach like that proposed in the comment. We will continue to evaluate alternate scoring approaches in future versions of CalEnviroScreen.
78.	Use of the Tool	CalEPA should consider CalEnviroScreen scores for regulations and enforcement.	CalEnviroScreen was developed in part to help OEHHA's sister regulatory agencies prioritize their activities.

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79.	Use of the Tool	CalEPA should be more specific about how the tool can and cannot be used. CalEnviroScreen should not be used for CEQA, permitting, regulatory or land use planning.	CalEnviroScreen was designed to assist the boards and departments of CalEPA in incorporating environmental justice into their programs, and the BDOs determine its specific applications. CalEnviroScreen is not intended to fulfill CEQA assessment requirements.
80.	Use of the Tool	CalEPA should work with agencies to ensure that users of the tool implement activities that address core equity issues in communities. Urge state agencies to use CalEnviroScreen for other purposes in addition to SB 535.	CalEnviroScreen is designed to assist CalEPA in its environmental justice mission. It is part of the Agency's ongoing efforts to ensure fair treatment of all Californians in the conduct of its activities. Uses for CalEnviroScreen beyond SB 535 are described in the report's <i>Guidance from the Secretary</i> chapter.
81.	Use of the Tool	Supports the use of CalEnviroScreen for allocating SB 535 funds to disadvantaged communities.	Comment noted.
82.	Use of the Tool	CalEnviroScreen is not suitable for allocating SB 535 funds statewide.	We respectfully disagree with this comment. CalEnviroScreen is intended to provide a statewide comparison of pollution burdens and vulnerabilities in California communities, and was developed with extensive input from academic experts, business and environmental justice groups, government agencies outside CalEPA, and the public. CalEnviroScreen was designed to identify disadvantaged communities pursuant to SB535 and its indicators are consistent with the criteria that SB 535 specifies for this purpose. The allocation of funds to these communities is decided by a separate process that is beyond the scope of this tool.
83.	Use of the Tool	CalEnviroScreen should not be the only tool used for allocating SB 535 funds to ensure that other disadvantaged communities are included.	Allocation of funds is determined through the budget process and not through use or revision of CalEnviroScreen.
84.	Use of the Tool	Tool should only be used to identify communities for further action, not for distributing funds.	The use of CalEnviroScreen to distribute funds is a budgetary decision.