Dear Linda and Lynn:

I am glad to note the progress being made with reference to HIA. While one can argue back and forth about what impacts can be quantified or not – ultimately it will depend on the data availability on dose-response relationships and the exposure estimates in an affected area. We know that a reduction in CO2 emissions is associated with co-pollutant reductions though the magnitude of these reductions can vary significantly depending on the source and the sector. HIA results (quantifiable) will primarily depend on this fraction of co-pollutant emissions evaluation in an affected segment of the population. Hence, determination of this segment of the population is a critical element.

The positive or negative findings will depend on the geographic scale (boundary) of analyses because it is more than likely that the potential negative impacts will not be significant at a regional scale, as we have often observed. In addition, the impacts need to be ascertained (per AB 32) in the context of existing levels of pollution burden. Thus, identifying the communities or areas where the analyses or evaluation takes place holds the key to the success or failure of this task.

Pastor et al. screening method takes into consideration all the factors that need to be considered in identifying these communities. It is also a method that considers the vulnerability factors (including some listed in ARB's land use hand book) and uses the exposure estimates provided by ARB. The attached draft prepared by the EJSEAT workgroup (I am a member of this workgroup) illustrates the importance and limitations of a methodology in relation to identifying the communities of concern. Pages 13-15 are relevant to our discussion on the subject.

ARB staff has repeatedly stated that this method would be the foundation for identifying the communities, would be releasing a white paper on the subject before the end of 2009 and that paper would undergo a peer review and public process prior to conducting HIA. However, it appears that HIA is progressing without this primary critical step. In fact, it was also agreed upon at the first PHWG meeting, that staff would present sensitivity analyses results on various indicators that were included in the screening method, so that PHWG

can agree upon a set of indicators that would be included for identifying the communities.

Hence, I urge ARB/DPH to focus on this critical task prior to proceeding with HIA and provide a brief update on this critical issue prior to beginning discussions on HIA on Monday.

Shankar B. Prasad, M.B.B.S
Executive Fellow
Coalition For Clean Air
1107 9th Street Suite 830
Sacramento, CA 95814

916.498.1560 X4. Phone
916.498.1547 fax
916.798.6366 cell