



September 15, 2014

CalEnviroScreen
Dr. John Faust Chief, Community Assessment & Research Section
Office of Environmental Health Hazard Assessment
1515 Clay St., Suite 1600
Oakland, California 94612

Subject: Comments on SB 535 Public Workshops -- Approaches to Identifying Disadvantaged Communities

Dear Dr. Faust:

The Southern California Alliance of Publicly Owned Treatment Works (SCAP) represents 82 public agencies that provide essential water and wastewater treatment to nearly nineteen million people in Los Angeles, Orange, San Diego, Santa Barbara, Riverside, San Bernardino and Ventura counties. We provide environmentally sound, cost-effective management of more than two billion gallons of wastewater each day and, in the process, convert wastes into resources such as recycled water and renewable energy. Our member agencies have also consistently supported the environmental justice communities within our respective service areas.

SCAP remains concerned that the numerous and fundamental flaws we identified in the original model were not corrected in OEHHA's most recent revision¹. Thus, we feel that the model is inappropriate for any purpose suggested in the model's guidance, including identifying communities for SB565 monies.

Our concerns seem to be validated by the latest treatment of the model in the various proposals to identify disadvantaged communities at the recent public workshops. The assortment of permutations under debate confirms that CalEnviroScreen is only a screening tool that cannot be used to identify actual impacts to communities.

What is needed, and what CalEnviroScreen does not provide, is a model that reports actual rather than perceived impacts. It seems logical that SB535 monies should be distributed proportionally to those communities with the greatest need. And yet, the model cannot measure the extent of this need. OEHHA explains that its scoring system "cannot describe the magnitude of the

¹ SCAP Comment Letter to OEHHA, February 1, 2013.

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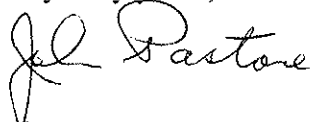
Fax: 760-479-4881 Tel: 760-479-4880 Website: www.scap1.org Email: info@scap1.org

difference between two or more areas.” Therefore, OEHHA should acknowledge that CalEnviroScreen cannot be used exclusively to identify disadvantaged communities.

We believe that OEHHA is neglecting the most appropriate use for this *screening* tool: to identify regions for further study. Quoting from one of OEHHA’s references, “The finding of effect modification by socioeconomic status should trigger further research [emphasis added] to better understand the intervening factors.”² The tool is insufficient on its own to serve as the final word on whether or how a vulnerable community is truly impacted by cumulative environmental burdens.

We appreciate your consideration of our comments on CalEnviroScreen, and look forward to working with you to revise this screening tool. If you have any questions regarding these comments, please do not hesitate to contact me at (760) 479-4880.

Very truly yours,



John Pastore, Executive Director

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² Samet JM, White RH (2004) Urban air pollution, health and equity. J Epidemiol Community Health, **58**:3-5.