SCAP
SOUTHERN CALIFORNIA ALLIANCE OF PUBLICLY OWNED TREATMENT WORKS

December 30, 2014

Dr. Jean Ospital, Health Effects Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765-4178

Re: Comments on the MATES IV Draft Report

Dear Dr. Ospital:

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.

SCAP appreciates this opportunity to comment on the MATES IV Draft Report (Draft Report). SCAP has followed all the MATES efforts, and we continue to remain impressed at the level of scientific rigor and dedication we find in each report. The most recent Draft Report continues this laudable trend.

It seems logical and appropriate that MATES should discuss, where valid, comparisons of its results to those from other reputable and scientifically valid sources. Thus, we are concerned about the inclusion of CalEnviroScreen results in Section 4.8 of the Draft Report. While we understand the interest to include a discussion regarding CalEnviroScreen, SCAP respectfully requests that the Final Report explain the substantial differences between this screening tool and a comprehensive risk analysis. For example, CalEnviroScreen has been used to estimate a community's combined "pollution burden and population characteristics" score, while MATES provides a lifetime risk estimate from exposure to air toxics.

SCAP's comments on Section 4.8 of the Draft Report are incorporated into the attached document for your consideration. Our membership believes that it is important to communicate that CalEnviroScreen scores are not an expression of health risk, and this screening tool is not intended to be used as a health or ecological risk assessment for a specific area or site.

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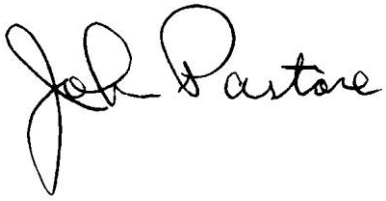
We appreciate your consideration of our comments, and look forward to working with SCAQMD on our mutual goal of cleaning the air. If you have any questions regarding these comments, please do not hesitate to contact me at (760) 479-4121.

Sincerely,



John Pastore, Executive Director

cc: Elaine Chang, SCAQMD
Philip Fine, SCAQMD

ATTACHMENT
SCAP's Recommended Revised Section 4.8 of the MATES IV Draft Report

4.8 California Communities Environmental Health Screening Tool (CalEnviroScreen)

Since the completion of the MATES III Study, the California Environmental Protection Agency (CalEPA) and Office of Environmental Health Hazard Assessment (OEHHA) developed a screening tool for evaluating multiple pollutants and stressors in communities, called the California Communities Environmental Health Screening Tool (CES). This tool has been used to estimate a community's "Pollution Burden and Population Characteristics" score, while MATES provides a lifetime risk estimate from exposure to air toxics. The purpose of this section is to outline the fundamental difference between MATES and CES.

In August 2014, CES version 2.0 was released. This version produces results at the census tract level for approximately 8,000 census tracts in California and approximately 3,600 tracts within the jurisdiction of SCAQMD. The model consists of two component groups – pollution burden and population characteristics. Unlike MATES, which provides a traditional health risk assessment approach using measured air toxic contaminants, CES considers pollution surrogates and community characteristics that have been shown to affect vulnerability to pollution, such as socioeconomic factors or underlying health status. A set of statewide indicators (Table 4-8), selected based on existing environmental, health, demographic and socioeconomic data, is used by CES to create a screening score for communities across the state.

Table 4-8
Indicators used to Represent Pollution Burden and Population Characteristics
in CES Version 2.0

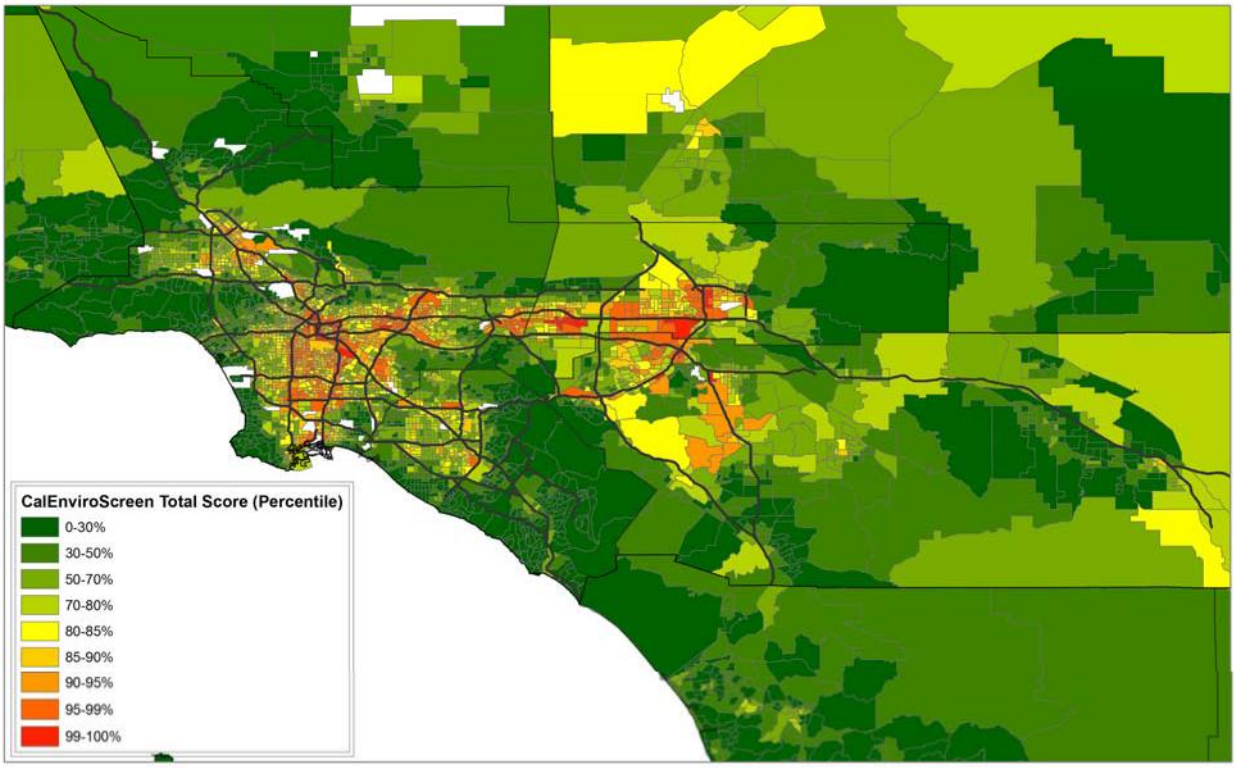
Component Group 1: Pollution Burden		**Component Group 2: Population Characteristics**	
Exposures	Environmental Effects	Sensitive Populations	Socioeconomic Factors
PM 2.5 concentrations Ozone concentrations Diesel PM emissions Pesticide use Toxic releases from facilities Traffic density Drinking water quality	Cleanup sites Groundwater threats Impaired water bodies Solid waste sites and facilities Hazardous waste	Children and elderly Asthma emergency department Low birth weight births	Educational attainment Linguistic isolation Poverty Unemployment

For each indicator, a value is assigned for each census tract. Among the areas with an indicator value, the values are ranked from highest to lowest and a statewide percentile score is created for each indicator in each census tract. The percentile score for all individual indicators is averaged in each component group and then divided by the maximum value observed in the State. In the pollution burden component group, environmental effects indicators are weighted half as much as the exposure indicators. The component group scores are both scaled to a maximum of 10 with a possible range of zero to 10. Finally, the overall CES score is calculated by multiplying the scaled component group score for pollution burden by the scaled component group score for population characteristics. The highest possible CES percentile score is 100

with an equal contribution from the two component groups. An area with a high score would be expected to have higher pollution burdens and vulnerabilities than other areas with low scores. Results produced by CES can help decision-makers determine how to focus available time, resources and programs to improve the environmental health of Californians.

Figure 4-17 depicts the CES score in SCAQMD highlighting the census tracts scoring in the highest percentiles across the state. Most urbanized areas are in the top 30% score, indicating these tracts have higher pollution burden and population characteristics compared to other communities in the State. In particular, a significant fraction of census tracts in the Los Angeles, Riverside and San Bernardino counties are in the top 10% of the relative statewide scoring.

Figure 4-17



CES Version 2.0 Overall Scores. ***Data retrieved from OEHHA in September 2014.***

While CES can assist CalEPA in prioritizing resources and helping promote greater compliance with environmental laws, it is important to note some of its limitations. The tool's output provides a relative ranking of communities based on a selected group of available datasets, through the use of a summary score. Unlike MATES, the CES score is not an expression of health risk, and does not provide quantitative information on increases in cumulative impacts for specific sites or projects. Further, as a comparative screening tool, the results do not provide a basis for determining when differences between scores are significant in relation to public health or the environment. Accordingly, the tool is not intended to be used as a health or ecological risk assessment for a specific area or site.