

# Supplemental Information - Examples

What is the potential and added value of this information? How would it inform and improve the permitting decision?

representatives often come and go: Environmental Justice communities have institutional knowledge, somewhat but not as long as tribal knowledge, that needs to be heard, valued and incorporated in the

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Lack of California's will to embrace the needed changes to protect our vulnerable communities.

In rural areas, Census Tracts can be very large geographically, distorting the data of a small established community within the Census Tract. Supplemental data on specific communities would be helpful.

What are the challenges associated with this information that need to be addressed?

There is value in simplicity and predictability. Why are the 21 data sets included in CalEnviroScreen not sufficient to identify vulnerable communities in CA?

Using a totality of the data approach leaves a lot of discretion to DTSC staff and puts communities who may not have resources to collect and submit data at a disadvantage.

It doesn't take into account the root cause of zoning issues

It takes a long time to get data through a traditional academic peer-review process which could mean it is outdated. Are there more dynamic modes of data collection that could be tagged as provisional?

# Community Perspective

Patrice/Julia

## RELEVANCE

## QUALITY

## TIMELINESS

What should be considered appropriate and substantive supplemental data for DTSC permitting decision process?

How should DTSC validate the relevance and appropriateness of supplemental information?

What additional guidelines are needed to ensure quality of data?

How can we ensure that these guidelines are inclusive while preserving the rigor of the data and its applicability to the permitting process?

How can DTSC ensure that this added step would not keep the permitting process from moving forward in a timely manner?

How would supplemental information impact permitting decisions?

Community information should be directional for the agency to take action - including following up to ensure the quality of that data as needed

Empower community to articulate their needs and think about their own solutions

Clearly define what supplemental information is needed: which indicators are not robust for a given community in CES and target that data

Supplemental info is good, particularly given concerns on under-inclusiveness, but set guardrails - a "closed universe" of information. Consider: compliance history

If there are data gaps, start gathering that info now. Consider involving another agency or process (e.g., OEHHA or AB617) to gather that info if needed.

Building relationships and empowering communities. Trusting their knowledge to continue research and collect data.

Be careful about who has resources to collect data & what their motivation is to provide data

Want transparency, trust, predictability - take discretion out of the process

Burden should not be on community.

Beware of "paralysis by analysis" - clearly define why CES is not enough; and ensure that floodgates do not allow so much data that the process is buried

Census tract size and boundaries are important - need to focus on community, not census tract

Focus on building partnerships between communities, agencies/ed institutions for funding & time & ensuring data quality

Provide clear guidelines for how particular data (e.g., median HH income) should be gathered to assure that if work is done, that data will be accepted, and ensure the quality of data

Businesses respond to demand: DTSC should identify where needed new facilities should be located, and open to bids to build/run those

I also want to raise that whatever comes out of this process may be a precedent for other types of decisions. Another reason why this shouldn't be onerous and difficult

Might need 2 sets of criteria: community and other, and DTSC follow up on info provided by communities to ensure quality

Look at where the facilities are, what the scores are in those communities in the margins, and gut check whether that is representative - rather than thinking about this in the abstract

Start to gather the data that is needed to supplement CES now

Start all these processes now: look at where facilities are and start looking at tiers, information needed, etc - do not wait for each permit expiration to arise

Provide certainty of the process and start the dialogues now

# Industry Perspective

Orit  
Diana  
Hin-Yun

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this actually show differently? How would DTSC consider air pollution burden using multiple data sets, and who would evaluate the data? Same applies for other domains, e.g., multiple indicators that depict

Is data meant to characterize the community, regardless of the HWF, or the HWFs contribution to the overall cumulative impacts?

How is a facility supposed to evaluate supplemental data and apply it to its proposed Work Plan? What are the boundaries by which a HWF will be required to offer up mitigations?

If it is supposed to be about a facility's proportional contribution, then this needs to be explicitly stated by DTSC. Would DTSC then reject data that is completely unrelated to the facility and its impacts?

How will DTSC ensure consistency in outcomes if each community has different data being considered?

Relevancy is more important than data quality. After that, weighting of evidence.

# Tribal Perspective

Patricia

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How would supplemental information impact permitting decisions?

# Local Agency Perspective

Evelia  
Gary

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Obligated to review if there is a true health impact; can't be perception based; tangible that a facility can correct, it should be corrected. The weighting should be based on how well we can substantiate it.

**If there is factual info that there is harm, DTSC should act on this data.**

If data is not substantiated, how do we address it? The weight that DTSC gives supplemental data should be linked to its rigor

Can't expect permit managers to be experts in all aspects; need a high bar on the quality of the data/information. How do we get the bar set to fairly treat unsubstantiated information?

Citizens collect data through "Purple Air" or other tools. Data from devices at a home could be used to substantiate data. Need to be tested and provide real error in that data. Acceptable sampling and error rates.

Could use the data as an "issue" indicator, and support any permit decisions with data from a reputable source.

Will create issues with timing - No specified timeline for supplemental information; may take a long time to go through; Confirm the information? Open ended amount of stuff will cause delays.

Thresholds might be needed to develop for permit decision. May take time in the permit decision.

**Make sure information is received in the appropriate time frame.**

Substantive evidence, based in fact; If meets criteria can utilize it. Thresholds? - What will be the thresholds? DTSC defaults to air districts or RWQCBs; DTSC can establish thresholds

**If evidence is based in fact, this needs to be considered.**

**Thresholds might be needed to develop for permit decision.**

Objectives that DTSC holds facilities to; shouldn't lessen the quality for outside data; balancing data quality with decisions is really important. Maybe need to work similarly with public to help them with a study to make it quality data

Perhaps facility can pay for data study when public has a concern? Will it ever be good enough?

Hard to put pm 2.5 concentration in line with health thresholds to compare to chemical threshold. HRA may only focus on 1 chemical of concern; HRA needs to consider total effects of all chemicals involved.

**Qualitative vs quantitative balance; where is the balance;**

Intent is not to do big social problem solving; if the facility is no longer there, what is the real impact to potentially less stringent requirements