March 23, 2026

Office of Environmental Health and Hazard Assessment
1515 Clay Street
Oakland, CA 94612

Subject: SANDAG Comments on Office of Environmental Health and Hazard Assessment's CalEnviroScreen 5.0 (Public Review Draft, January 2026)

Thank you for the opportunity to comment on the draft CalEnviroScreen 5.0 prepared by Office of Environmental Health and Hazard Assessment (OEHHA). San Diego Association of Governments (SANDAG) appreciates OEHHA's continued efforts to improve transparency, methodology, and environmental justice analysis across California. The following comments are offered to improve data currency, methodological clarity, and usability of the documentation.

1. Update to Most Recent Federal Datasets (Entire Document)

The document currently relies on the 2019–2023 American Community Survey (ACS) 5-Year estimates and the 2017–2021 Comprehensive Housing Affordability Strategy (CHAS) dataset from the U.S. Department of Housing and Urban Development. These sources are described as the most recent available data; however, the most current federal releases are the 2020–2024 ACS 5-Year estimates and the 2018–2022 CHAS dataset. Updating the documentation and methodology to reflect these datasets would ensure consistency with the latest available information and better capture current demographic and housing conditions.

2. Reliability of ACS Estimates at the Census Tract Level (Entire Document)

The document justifies the use of Census Tracts rather than Census Blocks on the basis that tracts have more stable population sizes and are less susceptible to extreme margins of error. While this rationale is generally sound, ACS tract-level estimates can still exhibit substantial sampling variability, particularly when metrics rely on restricted universes such as the civilian labor force, population age 25+, or households.

Although the use of percentile ranking may reduce the influence of outliers, it does not eliminate issues related to margin of error or small-sample reliability. For example, when unemployment is calculated using the civilian labor force universe, Census Tracts 113 and 187 are identified as having high unemployment rates. However, these tracts contain substantial military populations. In Census Tract 113, only 114 individuals are classified as civilians in the labor force because active-duty military personnel are excluded from the ACS definition of the civilian labor force. As a result, the unemployment rate is derived from a very small denominator and may not accurately represent overall employment conditions in the tract.

This concern may extend to other ACS-derived indicators relying on restricted universes. OEHHA may wish to consider incorporating reliability thresholds, coefficient-of-variation screening, aggregation methods, or alternative universe definitions where appropriate to

address potential instability in small-sample estimates.

3. Clarification of CHAS Dataset References (Page 197 – Housing Burden Indicator)

Within the Housing Burden indicator methodology, the first bullet point under "Method" references the 2013–2017 HUD CHAS dataset, while earlier sections of the document reference the 2017–2021 CHAS dataset as the most recent results used. The documentation should clarify which dataset is actually used in the analysis. Based on the surrounding discussion, the 2017–2021 dataset appears to be the intended reference and should be updated in the Method section for consistency.

4. Include ACS Table Numbers for Transparency (Multiple Sections)

Several indicators reference "ACS data" or "a dataset" without specifying the ACS table used. Including the specific ACS table number would significantly improve transparency and reproducibility for reviewers and future users. We recommend adding table references in the following locations:

- **Pages 181, 192, 203, 208, 213** – Sensitive Population Indicators (Diabetes Prevalence, Educational Attainment, Linguistic Isolation, Poverty, Unemployment)
- **Pages 20–28** – Indicator Update Details for indicators derived from ACS data
- **Page 60 (Appendix)** – Estimating Number of Housing Units and Year Built

Providing the exact ACS table numbers would make it easier for reviewers and analysts to verify data sources and replicate calculations.

5. Clarify Use of ESRI Population Data (Pages 171–176)

For the Asthma and Cardiovascular Disease indicators, the documentation references **Esri population data rather than ACS estimates. It would be helpful to include a brief explanation of why ESRI population data were used instead of ACS data and to specify the exact ESRI dataset used. Adding this information to the references section would improve transparency regarding data sources.

6. Formatting Improvements in Appendix Table (Page 118)

In the Appendix section titled "Number of Cleanup Sites in CalEnviroScreen 5.0," the table formatting should be improved. The table heading appears misaligned with the rest of the table, and the row listing site types is difficult to read. Reformatting the table so that headings and rows align clearly would improve readability for users reviewing the documentation.

Conclusion

Overall, we commend OEHHA's efforts to refine CalEnviroScreen and maintain a transparent methodology for identifying communities disproportionately affected by environmental and socioeconomic burdens. Please feel free to contact Anna Millar at amill@sandag.org for any clarification or discussion regarding these recommendations.

Sincerely,

Anna Millar

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