



March 31, 2026

Office of Environmental Health Hazard Assessment  
California Environmental Protection Agency  
1001 I St.  
Sacramento, CA 95814

**Re: Public Comment on CalEnviroScreen 5.0 Draft**

Dear OEHHA,

We would like to thank the California Environmental Health Screening Tool (CalEnviroScreen) team for all their work on improving this tool over the years. We recognize that CalEnviroScreen is a very powerful and user-friendly resource to help map environmental justice, designate disadvantaged communities, and influence public decision making and investments.

We would like to submit the following comments on the CalEnviroScreen 5.0 draft:

**A. Positive**

1. **Community-engagement.** We greatly appreciate OEHHA's efforts in its methodology and approach that acknowledges the value of lived experiences: from partnering with 8 community-based organizations to update the draft; the publication of the co-design report<sup>1</sup> which details this process; providing multiple spaces for public comment on the draft such as the informational webinars, the workshops, and written comments, to outlining group agreements during the Draft webinar presentation to promote an inclusive setting.
2. **Inclusion of new indicators.** We appreciate the inclusion of diabetes prevalence as well as small air toxic sites.
3. **Improving existing indicators.** We appreciate the expanded buffer around large hazardous waste facilities from 1 km to 4 km; the inclusion of drinking water contaminants; the inclusion of children's lead risk from housing; and updating all existing indicators with the most recent data available.

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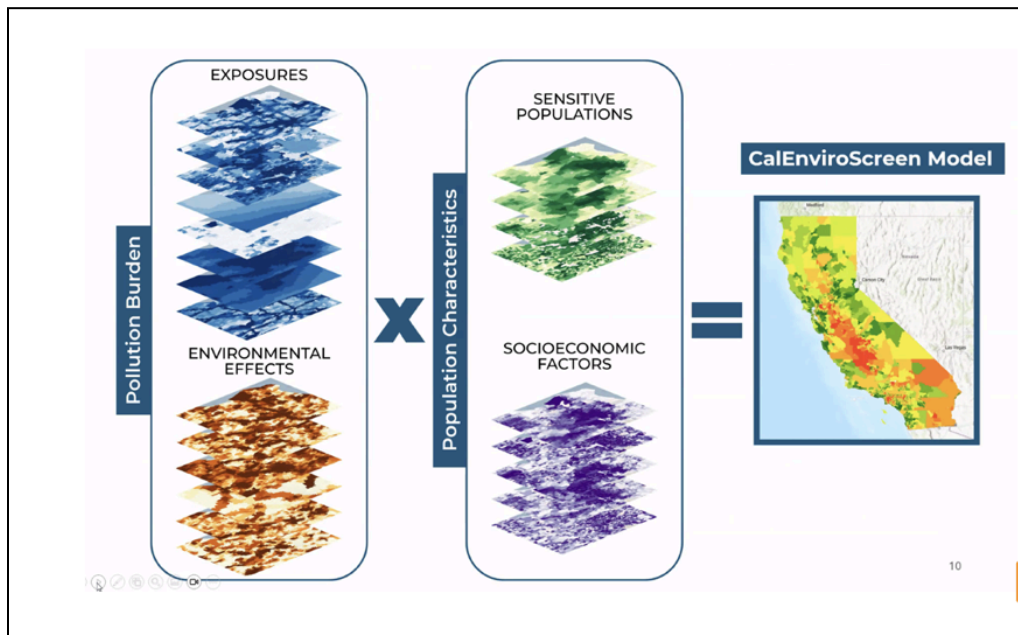
<sup>1</sup> Office of Environmental Health Hazard Assessment. (January 2026) *Update to the California Communities Environmental Health Screening Tool Draft CalEnviroScreen 5.0 Public Review Technical Report*. [Online] California Environmental Protection Agency Office of Environmental Health Hazard Assessment. Available from: <https://oehha.ca.gov/sites/default/files/media/2026-01/calenviroscreen50techreportd12226.pdf>. (Accessed: March 31, 2026)

4. **Compare maps.** We appreciate the ability to compare Draft CalEnviroScreen 5.0 results with CalEnviroScreen 4.0 in the map viewer as it allows users to see how indicators may have changed due to changes in the measurements, census tract boundaries, and/or environmental or population changes or due to the improved accuracy in the measurements.
5. **About the Model.** It is very helpful that users can easily find the model explained with a graphic.
6. **Data.** We greatly appreciate that the public can access and download all CalEnviroScreen data in various formats with “no restrictions on public use”. This significantly enhances transparency on behalf of OEHHA as well as the public’s ability to reproduce OEHHA’s findings and generate additional analyses and insights.
7. **Spanish language.** We appreciate that the tool is available in Spanish—California’s second most spoken language—as this broadens its accessibility.

## B. Suggested improvements

1. **Add map color legend:** It would be helpful if a legend was included on the online map that signifies the different colors used to represent different components, such as in the webinar slides (*see Image 1 below*), and that these colors were used consistently. In fact, the visuals in About CalEnviroScreen on slides 2 and 3 (*see Images 2 and 3 below*) do not use the same colors as the map viewer, which may cause confusion.

**Blue:** exposures  
**Orange:** environmental effects  
**Green:** sensitive populations  
**Purple:** socioeconomic factors:



*Image 1.* Webinar slides showing components in different colors.

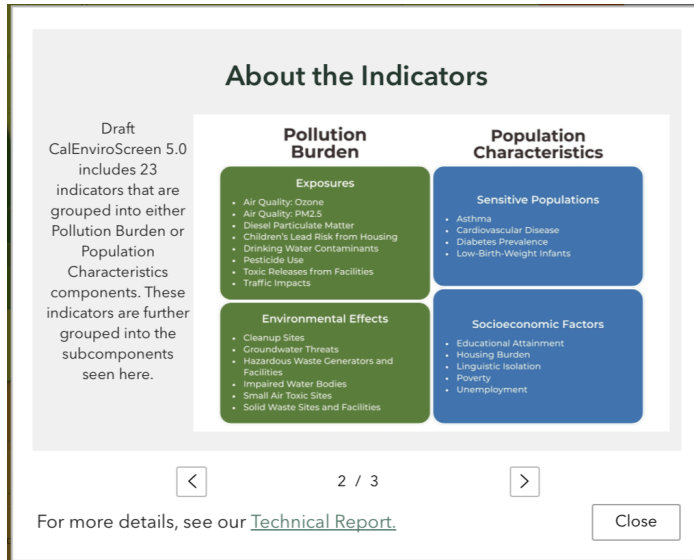


Image 2. Web tool About CalEnviroScreen slide 2/3.

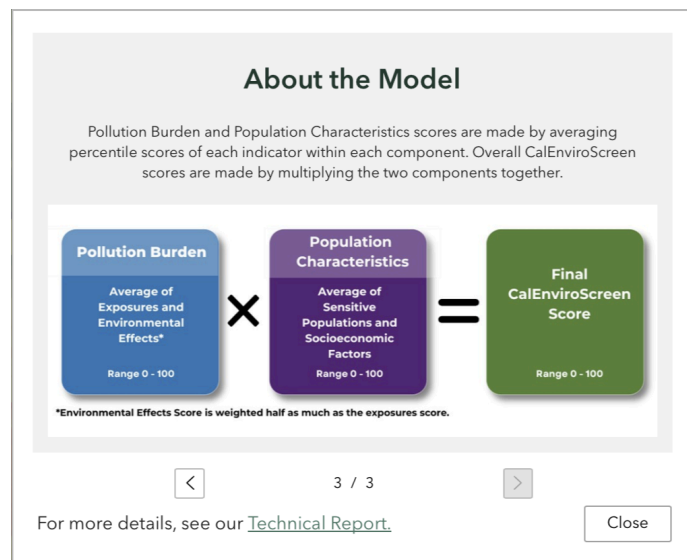


Image 3. Web tool About CalEnviroScreen slide 3/3.

2. **Change individual indicator viewer to multiple indicator viewer.** It is extremely limiting that “Only one indicator can be viewed at a time”. It would be useful if several pollution burden indicators could overlap and/or multiply with population characteristics indicators.
  - a. Could we group multiple pollution burden indicators such as drinking water contaminants and pesticide use to better map the various pollution burdens that impact communities at once? For instance, this would make it possible to group pollutants by medium (eg, air, water).
  - b. Could we overlap pollution burdens and population characteristics, such as pesticide use (pollution burden) and asthma (population characteristic indicator)?
3. **Data description.** All indicators could be described more in depth in the web tool to

enhance the public's ability to analyze and interpret the data.

4. **Improving Pesticide Use indicator:** We appreciate the thoughtful and in depth analysis of the correlation between high use of pesticides and exposure and acute pesticide illness and chronic disease outcomes.
  - a. The technical report describes this indicator as “total pounds of 124 selected active pesticide ingredients (filtered for hazard and volatility) used in production agriculture per square mile, averaged over three years (2021 to 2023).<sup>2</sup>” The list of all registered pesticides used in California was narrowed down by selecting those with a high chemical volatility that are classified as “highly” or “moderately” potentially hazardous under SB 950, listed under Proposition 65, or designated by the DPR as Toxic Air Contaminant (TAC) or California Restricted Active Ingredients. Given that it is extremely difficult to track the full extent of the harm that pesticides cause to humans and the environment, narrowing the list can be problematic. Specifically, we would like to request that CalEnviroScreen include the following four active ingredients: (1) acephate, (2) bensulide, (3) MITC, (4) naled, and (5) propanil, a CA Restricted Material which is included in the list for CalEnviroScreen 4.0 but was we assume was inadvertently left off the proposed list for version 5.0.
  - b. We recommend that the CalEnviroScreen team compare their selection criteria to the Pesticide Action and Agroecology Network’s criteria for designating their own list of Bad Actor Pesticides as described in their website<sup>3</sup>:

## PAN Bad Actor Pesticides

To identify a “most toxic” set of pesticides, Pesticide Action Network (PAN) created the term PAN Bad Actor. These pesticides are at least one of the following:

- Known or probable **carcinogens**, as designated by the International Agency for Research on Cancer (IARC), Globally Harmonized System of Classification and Labelling of Chemicals (GHS), U.S. National Toxicology Program, US EPA Toxic Release Inventory (TRI) cancer list or the state of California’s Proposition 65 list.

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<sup>2</sup> Office of Environmental Health Hazard Assessment, California Environmental Justice Alliance Center for Race, Poverty, and the Environment, Central California Environmental Justice Network, Comité Cívico del Valle, Communities for a Better Environment, Environmental Health Coalition, Physicians for Social Responsibility – Los Angeles, & UNIDOS Network, Inc. (January 2026). *Mapping Local Knowledge and Experiences: Co-designing Proposed Updates to CalEnviroScreen with California Communities*. [Online] California Environmental Protection Agency - Office of Environmental Health Hazard Assessment. Available from: <https://oehha.ca.gov/sites/default/files/media/2026-01/calenviroscreen50codesignreportd12226.pdf> (Accessed: March 31, 2026)

<sup>3</sup> Pesticide Action and Agroecology Network. (n.d.). *Data Details*. Available from: <https://www.pesticideinfo.org/resources/data-detail-definitions/> (Accessed: March 31, 2026)

- **Reproductive or developmental toxicants**, as designated by Globally Harmonized System of Classification and Labelling of Chemicals (GHS), US EPA Toxic Release Inventory (TRI) reproductive and developmental toxicant lists, and the state of California’s Proposition 65 list.
- Neurotoxic **cholinesterase inhibitors**, as designated by California Office of Environmental Health Hazard Assessment, U.S. EPA, and/or PAN staff evaluation of chemical structure (for organophosphorus compounds).
- Known **groundwater contaminants**, as designated by the state of California (for actively registered pesticides) or from historic groundwater monitoring records (for banned pesticides).
- Pesticides with high **acute toxicity**, as designated by the World Health Organization (WHO), the Globally Harmonized System of Classification and Labelling of Chemicals (GHS), or U.S. EPA.

- c. This selection criteria should be expanded to include those pesticides containing PFAS, pyrethroids, and neonicotinoids. These pesticides are of significant concern to the public due to the increased evidence linking exposure with neurodevelopmental and other health effects.
- d. It would be very helpful if the Data Description included a link to the selected pesticides.
- e. In the appendix and tool search features, it would be useful to add information categorizing pesticides by class such as fumigants, organophosphates, carbamates, pyrethroids for reference. Such categorization is important to understand the effects of different classes of pesticides, and help California transition away from hazardous pesticide use to safer and more sustainable pest management practices and reduce racial and other disparities, as advised in the Sustainable Pest Management Roadmap<sup>4</sup>.
- f. The web tool states in the Data Description: “Applications are averaged over the census tract area, and some may occur adjacent to the census tract rather than within it.” However, we did not find how “adjacent” applications are defined in the technical report. Census tracts vary significantly in surface area and pesticides may drift for miles.

5. **Add Race/ethnicity profile to the map viewer.** Race and ethnicity are key social determinants of environmental health and are strongly associated with disproportionate exposure to environmental pollution. While users can click on each census tract to view its racial/ethnicity profile, it would be very useful if this population indicator could also be a layer we could see geographically represented. This layer could show the percentile for each racial/ethnic category, making spatial patterns easier to see.

6. **Inclusion of Population Characteristics.** We propose the consideration of the following characteristics to be included in the CalEnviroScreen:

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<sup>4</sup> Acosta, J. et al. (January 2023) Accelerating Sustainable Pest Management: A Roadmap for California. [Online] California Environmental Protection Agency - Department of Pesticide Regulation. [https://www.cdpr.ca.gov/wp-content/uploads/2024/10/spm\\_roadmap.pdf](https://www.cdpr.ca.gov/wp-content/uploads/2024/10/spm_roadmap.pdf) (Accessed: March 31, 2026)

- a. **Life expectancy/mortality.** Life expectancy is strongly predicted by race and zip code (place of residence). Tracking this indicator can help reveal how life is supported (and limited) by socioenvironmental indicators.
  - b. **Age.** Including vulnerable age groups—children (0–5 years) and older adults (65+ years)—is important, as these populations are more susceptible to environmental health risks. The American Community Survey (ACS) conducted by the US Census Bureau collects data on people’s age.
  - c. **Access to health insurance coverage.** Since health outcomes are closely linked to healthcare access, pollution burdens may have unequal effects across insured and uninsured populations. Incorporating this data would improve the assessment of environmental health vulnerability. The American Community Survey (ACS) conducted by the US Census Bureau collects information on whether people have health insurance or health coverage plans.
  - d. **Cancer.** Mapping the distribution of cancer can help identify potential cancer clusters and environmental hazards.
  - e. **Food (in)security.** Given how hunger is growing in the state due to increasing social inequality, and rollback of federal benefits, we propose considering food security.
- 7. Inclusion of climate-related indicators.** We suggest including the following indicators to help examine how climate change is also an environmental justice matter that impacts communities differently:
- a. Rising heat temperatures
  - b. Wildfire pollution
  - c. Flood risk
- 8. Inclusion of environmental benefits.** Environmental justice does not only involve the (un)just distribution of harm but also of environmental benefits, such as access to tree coverage, parks, and protected natural areas, which have been repeatedly proven to have environmental health benefits.

Again thank you for the opportunity to comment to improve this tool.

Sincerely,



Angel García  
Co-Director



Mayra Sánchez  
Associate Director