



April 1, 2026

CalEnviroScreen
Community and Environmental Epidemiology Research Branch
Office of Environmental Health Hazard Assessment
1001 I St., fl. 12
Sacramento, CA 95814

RE: Written Comment on Draft CalEnviroScreen 5.0

OEHHA Should Continue Improving CalEnviroScreen by Adding Indicators to Show Land Use Plans and the Locations of Facilities Utilizing Emerging Technologies

A. Summary of Comment

1. The International Human Rights Clinic (IHRC) at Santa Clara University School of Law welcomes this opportunity to provide written comments on the Draft CalEnviroScreen 5.0 (CES 5.0). IHRC supports the updates included in CES 5.0, the proposed latest iteration of the California Communities Environmental Health Screening Tool, because CES 5.0 improves indicators to better reflect environmental conditions and a population's vulnerability to environmental pollutants. In addition to the positive measures already included in the update, IHRC proposes the addition of two indicators that would add to the tool's efficacy.

2. First, the Office of Environmental Health Hazard Assessment (OEHHA) should consider adding an indicator or mapping overlay to visualize a jurisdiction's land use plan. This addition would allow the tool to better address the cumulative effects of pollution burden and population vulnerability, and to identify which communities might be in need of particular policy, investment, or programmatic interventions.

3. Second, OEHHA should include an indicator showing where facilities with emerging technologies are being sited. Development projects utilizing emerging technology such as data centers, hydrogen facilities, and Battery Energy Storage Systems (BESS) pose known environmental and public health risks to communities where they are located. By adding the

locations of proposed facilities to CES, the tool will more effectively support environmental justice (EJ) communities in understanding their cumulative exposure and assessing the risks posed by these new facilities. In turn, this will help local decisionmakers make more informed land use decisions concerning these facilities.

4. IHRC agrees with the Draft CES 5.0's incorporation of the new Small Air Toxic Sites and Diabetes Prevalence indicators. We also applaud the addition of a refined methodology to calculate the Drinking Water Contaminants Indicator and the addition of per- and polyfluoroalkyl substances (PFAS) chemical monitoring into its indicator.¹ These indicators strengthen CalEnviroScreen's ability to identify overburdened communities by incorporating additional environmental burdens and health conditions that drive both pollution burden and population sensitivity to pollution.

5. Further, IHRC supports the comments and additions proposed by California Rural Legal Assistance, Inc. (CRLA) in its written comment submitted on April 10, 2026. CRLA provides the following recommendations to the Draft CES 5.0:

- Include the air quality impacts from dairies and other confined animal feeding operations (CAFOs) as a standalone indicator or into relevant Air Quality indicators. This is important to ensure that CES 5.0 adequately and equitably maps significant local air quality impacts across both urban and rural areas of the state;
- Adopt an additional indicator regarding the affordability of drinking water, using data compiled by the State Water Resources Control Board through its SAFER program. This is an issue that disproportionately impacts communities in the Central Coast and Central Valley;
- Incorporate the most up-to-date available data on groundwater levels into the Groundwater Threats indicator to ensure that CES 5.0 captures the impact of drought and water use. Many Californians struggle with the effects of drought and the local overuse of groundwater. Decreasing groundwater levels have disproportionately impacted rural Californians living in the Central Valley and Central Coast, especially agricultural communities relying on groundwater wells; and
- Add a new indicator considering access to green space. The lack of access to green space is an environmental injustice that disproportionately impacts unincorporated communities in the Central Valley, and should be captured in CES 5.0.

¹ We do, however, agree with the concern raised by California Rural Legal Assistance, Inc. in their written comment on CES 5.0 that current data collection methods for PFAS may underrepresent exposure risks in rural populations compared with urban areas due to less frequent or comprehensive monitoring in rural areas.

B. Introduction

6. IHRC offers law students the opportunity to gain professional experience working on cases and issues related to international human rights law. Students collaborate with human rights organizations and experts, primarily in the United States and Latin America, through research, litigation, documentation, writing, and advocacy. The International Human Rights Clinic has also worked on environmental justice matters throughout the state of California, including the San Francisco Bay area and the Central Valley.

7. CalEnviroScreen was developed by the Office of Environmental Health Hazard Assessment to address the cumulative effects of both pollution burden and factors of population vulnerability in order to identify which communities in the state have the greatest need for policies and investments to address critical environmental issues.² To ensure that CalEnviroScreen 5.0 effectively serves this purpose, IHRC respectfully submits the following recommendations for additions to CES 5.0.

C. CalEnviroScreen 5.0 Should Include an Indicator Showing Each City and County's Land Use Plan

8. We first recommend that an updated version of CalEnviroScreen incorporate an additional indicator showing each jurisdiction's land use plan. Specifically, CES would benefit from adding land use designations and zoning maps because those materials show where industrial, commercial, and residential uses are planned and legally allowed. This addition would add a map filter through which users could see how specific health and environmental indicators align with a jurisdiction's zoning and general plans. Local zoning codes and land use policies have historically been tools for concentrating pollution in low-income communities and communities of color, but these same tools can be effective means to remediate cumulative and disproportionate environmental burdens.³ Adding a land use indicator to CES 5.0 would also help jurisdictions comply with their general plan obligations under S.B. 1000.⁴

9. The addition of land use data would help CES users better understand how census tract-based data matches up with jurisdictional boundaries and accompanying land use plans. The Draft Technical Report notes that the CalEnviroScreen model is place-based

² Office of Environmental Health Hazard Assessment, CalEnviroScreen 5.0 Technical Report, p. 4 (Dec. 2026) <https://oehha.ca.gov/sites/default/files/media/2026-01/calenviroscreen50techreportd12226.pdf>.

³ Vicki Been, Nisha Abiraj, Nicholas B. Tishman, & Madeline Trievus, Nat. Res. Def. Council, *Local Policies for Environmental Justice: A National Scan* (2019) <https://www.nrdc.org/sites/default/files/local-policies-environmental-justice-national-scan-tishman-201902.pdf>.

⁴ S.B. 1000, ch. 587 (2016) (codified at Cal. Gov't Code § 65302(h)).

and provides geographic information through census tract data.⁵ Because the model is organized around place, census tract data can be especially useful when combined with jurisdictions' existing land use plans. This addition would make visible the patterns created by historical trends in inequitable zoning; and conversely, allow users to identify opportunities for more effective targeting of policy and mitigation measures to redress the effects of inequitable zoning and prevent any threatened deepening of those effects.⁶ The goal would be to enhance the utility of CES to target measures of redress and to prevent new developments or other land use plans from exacerbating existing inequities. Doing so would help decisionmakers and the public better understand how environmental and health burdens map onto local zoning and planning decisions, and could better address critical environmental issues.

10. Additionally, land use planning data is especially vital because California S.B. 1000 (2016) directs cities and counties to review and update provisions of their general plan to address disadvantaged communities,⁷ environmental justice, and climate adaptation and resiliency as required under the State Planning and Zoning Law.⁸ CalEnviroScreen supports the general plan's environmental justice requirements because it helps local governments identify disadvantaged communities and understand cumulative burdens.

11. To comply with the environmental justice element, a city or county must satisfy various statutory provisions. First, they must identify disadvantaged communities that are located within the boundaries of their general plan.⁹ If the jurisdiction identifies a disadvantaged community, the city or county must: (A) Identify objectives and policies to reduce the unique or compounded health risks in disadvantaged communities by means that include, but are not limited to, the reduction of pollution exposure, including the improvement of air quality, and the promotion of public facilities, food access, safe and sanitary homes, and physical activity; (B) Identify objectives and policies to promote civic engagement in the public decisionmaking process, and (C) Identify objectives and policies that prioritize improvements and programs that address the

⁵ Office of Environmental Health Hazard Assessment, CalEnviroScreen 5.0 Technical Report, pp. 7-8 (Dec. 2026) <https://oehha.ca.gov/sites/default/files/media/2026-01/calenviroscreen50techreportd12226.pdf>.

⁶ For example, low-income people of color predominantly live in areas that are zoned for industrial or other less desirable uses. See Ashley Werner, Daniel Carpenter-Gold, & Gabriel Greif, *Concentrated Overburden: Reviewing the Enduring Legacy of Racial Discrimination in California Land Use Policy and Charting a Path to Equity*, Emmett Institute on Climate Change and the Environment: UCLA School of Law (Apr. 2023) https://law.ucla.edu/sites/default/files/PDFs/Publications/Emmett%20Institute/Emmett_Land-Use-1h_digitalFINAL_2.pdf.

⁷ Cal. Gov't Code § 65302(h). The statute defines "disadvantaged communities" as "an area identified by the California Environmental Protection Agency pursuant to Section 39711 of the Health and Safety Code or an area that is a low-income area that is disproportionately affected by environmental pollution and other hazards that can lead to negative health effects, exposure, or environmental degradation."

⁸ Cal. Gov't Code § 65300, *et seq.*; see Cal. Gov't Code § 65302(h) for the environmental justice element; See also S.B. 244, ch. 513, 2011, addressing the infrastructure needs of "Disadvantaged Unincorporated Communities."

⁹ Cal. Gov't Code § 65302(h)(1).

needs of disadvantaged communities.¹⁰

12. Adding a land use map to CalEnviroScreen would help facilitate city and county compliance with each statutory provision listed above. Localities would be able to accurately survey how environmental harms such as pollution exposure and air quality align with their land use plans. They could also better assess whether underlying vulnerabilities in a particular area's population render that area unsuitable for certain planned uses. Adding this element to CES would enhance local government compliance with the environmental and climate justice objectives of California's general plan requirements.

13. While California S.B. 1000 does not mandate that localities use CES to fulfill the statute's requirements, the California Attorney General's guidance highlights CES as a useful mechanism to implement S.B. 1000.¹¹ CES would become a much more useful tool for decisionmakers to use in S.B. 1000 compliance if it includes a filter that directly shows how current land use plans map onto CES's existing health and environmental indicators.

14. Moreover, the Draft's Technical Report indicates that climate change indicators and impacts are being considered for future iterations of CalEnviroScreen.¹² While acknowledging that the intricacies of developing these metrics pose difficulties, State planning law already mandates that localities consider climate adaptation and resiliency in their general plans.¹³ Specifically, a local jurisdiction must review and update their general plan's safety element to address climate adaptation and resiliency strategies applicable to the city or county.¹⁴ Thus, including land use plans in CalEnviroScreen would support state planning law compliance and also help OEHHA take steps towards incorporating climate data into CES.

15. Integrating land use data into CES would also improve the public's ability to use the tool to promote environmental equity. Members of the general public, and those living in disadvantaged communities, would be better able to participate in decisionmaking processes and thereby promote more informed decisions by local entities. More informed decisionmaking would lead to targeted programs that specifically address the needs of disadvantaged communities as identified by a locality's Environmental Justice Element and CalEnviroScreen. Increased visibility of how land use planning interacts with existing EJ vulnerability factors and

¹⁰ Cal. Gov't Code § 65302(h)(1)(A)-(C).

¹¹ Environment & Land Use Section, Office of Att'y Gen. of Cal. Dep't of Just., Senate Bill 1000 (S.B. 1000) (Mar. 28, 2026) <https://oag.ca.gov/environment/sb1000>.

¹² Office of Environmental Health Hazard Assessment, CalEnviroScreen 5.0 Technical Report, p. 11 (Dec. 2026) <https://oehha.ca.gov/sites/default/files/media/2026-01/calenviroscreen50techreportd12226.pdf>.

¹³ Cal. Gov't Code § 65302(g).

¹⁴ Cal. Gov't Code § 65302(g)(4); A local jurisdiction's safety element must include, but is not limited to, the following: a vulnerability assessment that identifies the risks that climate change poses to the local jurisdiction and the geographic areas at risk from climate change impacts... Cal. Gov't Code § 65302(g)(4)(A)(i); A set of feasible implementation measures designed to avoid or minimize climate change impacts associated with new uses of land. Cal. Gov't Code § 65302(g)(4)(C)(i).

sources of pollution could help the public more effectively guard against the siting of additional polluting sources in communities that are already overburdened. Even though only jurisdictions with disadvantaged communities are required to incorporate EJ goals, policies, and programs, all communities are affected by land use and other planning decisions that impact health.¹⁵

16. CES 5.0 would be significantly strengthened by adding an indicator that links CES results to each jurisdiction's zoning and general plan framework. Integrating a land use plan map filter would allow decisionmakers and the public to see how health and environmental burdens align with planning choices. This addition is especially important because state planning law requires local governments to address environmental justice through their general plans, including identifying disadvantaged communities, adopting policies to reduce compounded health risks, promoting civic engagement, and prioritizing programs that respond to community needs. A land use indicator would make CES more operational for jurisdictions implementing these obligations by providing a clearer, user-friendly way to evaluate whether planned land uses and zoning decisions align with EJ objectives. This addition would also equip residents, particularly those in disadvantaged communities, with information that supports meaningful participation in public decisionmaking. Although S.B. 1000 does not require localities to use CalEnviroScreen, the Attorney General's guidance identifies CES as a useful implementation tool; aligning CES outputs with local land use plans would make that guidance more practicable and improve the quality of local planning and permitting decisions. Finally, incorporating land use planning data would also support the State's evolving approach to climate resilience and adaptation. As OEHHA considers climate change indicators for future iterations of CalEnviroScreen, land use plans provide an existing, legally mandated framework for climate adaptation and resiliency, making a land use indicator a concrete step toward integrating climate considerations into CES in a way that is immediately usable at the local level.

D. CES 5.0 Should Support Integration of the Precautionary Principle by Including an Indicator that Tracks the Locations of Proposed Facilities that Utilize New Technologies

17. IHRC recommends adding an indicator that shows the location of facilities using new technologies that are known to pose certain health and environmental risks. EJ communities are concerned that they are being targeted for the siting of new technologies that may pose environmental and health risks, such as Battery Energy Storage Systems (BESS), data centers, and hydrogen energy production and storage facilities.¹⁶ By adding these facilities to CES, the

¹⁵ Governor's Off. of Plan. & Rsch., General Plan Guidelines ch. 4, Environmental Justice Element, p. 7 (June 2020) https://lci.ca.gov/docs/20200706-GPG_Chapter_4_EJ.pdf. The Guidelines state that it is good planning practice for all jurisdictions to consider integrating EJ policies and adopting a more holistic planning approach in the general plan or other local planning documents to promote equity and protect human health from environmental hazards.

¹⁶ EPA Oversees Largest Lithium-Ion Battery Cleanup in Agency History at Moss Landing, U.S. Env't Prot. Agency (Sept. 29, 2025), <https://www.epa.gov/newsreleases/epa-oversees-largest-lithium-ion-battery-cleanup-agency-history-moss-landing>; Naomi Slagowski and Christopher DesAutels, *Environmental and Community Impacts of Large Data Centers*,

tool will more effectively support EJ communities in understanding their cumulative exposure and assessing the risks posed by these new facilities. This indicator will help decisionmakers at the City and County level use CES 5.0 to guide permitting and enforcement decisions and prioritize resources in overburdened communities.¹⁷

18. The Precautionary Principle dictates that, “where there are threats of serious or irreversible damage, lack of full scientific certainty shall not be used as a reason for postponing cost-effective measures to prevent environmental degradation.”¹⁸ The Precautionary Principle is well-established in domestic and international environmental law and is an important tool to avoid decisions that may place an undue burden on disadvantaged communities. But the Precautionary Principle does not fulfill its purpose unless preventive methods for carrying out precaution are implemented. Preventive actions should be taken, when possible, at the design stage of a potentially hazardous activity to ensure their greatest impact.¹⁹ Further, a precautionary approach to environmental and public health decision-making includes the following specific components:

- (i) Taking precautionary action before scientific certainty of cause and effect,
- (ii) Setting goals,
- (iii) Seeking out and evaluating alternatives,
- (iv) Shifting burdens of proof, and
- (v) Developing more democratic and thorough decisionmaking criteria and methods.²⁰

19. Access to information about emerging sources of environmental risk is essential to achieving the last point above. By including such information through the highly accessible CES platform, California would allow affected communities and other stakeholders to more easily understand the full cumulative impact and environmental risks posed by emerging technologies of concern, thereby promoting robust participation in environmental decisionmaking and enhancing environmental justice and democracy. Developing inclusive decisionmaking criteria

Gradient (Fall 2024) https://gradientcorp.com/trend_articles/impacts-of-large-data-centers/; Fatima Abdul-Khabir, *Raising the Red Flag: Impacts of an Unregulated Hydrogen Industry on Environmental Justice Communities*, The Greenlining Institute (July 31, 2024) <https://greenlining.org/2024/impacts-of-an-unregulated-hydrogen-industry/>.

¹⁷ Office of Environmental Health Hazard Assessment, CalEnviroScreen 5.0 Technical Report, p. 5 (Dec. 2026), <https://oehha.ca.gov/sites/default/files/media/2026-01/calenviroscreen50techreportd12226.pdf>.

¹⁸ Rio Declaration on Environment and Development, United Nations Conference on Environment and Development, Rio de Janeiro, June 3 to 14 1992, UN Doc. A/CONF.151/26/Rev.1 (Vol. 1), Principle 15; While the Precautionary Principle finds more support in international law, States in the U.S. have periodically discussed methods to implement this principle. See Joel Tickner, Carolyn Raffensperger & Nancy Myers, *The Precautionary Principle in Action: A Handbook* (1st ed. 2003), p. 2

<https://www.calepa.ca.gov/wp-content/uploads/2016/10/EnvJustice-Documents-2003yr-Appendices-AppendixI.pdf>.

¹⁹ Joel Tickner, Carolyn Raffensperger & Nancy Myers, *The Precautionary Principle in Action: A Handbook* (1st ed. 2003), p. 5

<https://www.calepa.ca.gov/wp-content/uploads/2016/10/EnvJustice-Documents-2003yr-Appendices-AppendixI.pdf>.

²⁰ Joel Tickner, Carolyn Raffensperger & Nancy Myers, *The Precautionary Principle in Action: A Handbook* (1st ed. 2003), pp. 4-5

<https://www.calepa.ca.gov/wp-content/uploads/2016/10/EnvJustice-Documents-2003yr-Appendices-AppendixI.pdf>.

and methods is a guiding principle for CalEnviroScreen.²¹ It is especially critical to apply this principle to the types of proposed facilities identified here, in large part because California has aggressively pursued investment in these emerging technologies, yet information-sharing with potentially affected communities has not kept pace.

20. Affected communities lack accurate, up-to-date information about the proposed siting of these facilities, which has exacerbated their concerns about the potential environmental and health risks. These technologies include, but are not limited to, Artificial Intelligence (AI) and the data centers needed to support AI,²² BESS facilities,²³ and hydrogen energy hubs.²⁴ Each of these emerging technologies poses known human health and environmental risks. Hydrogen facilities can increase energy affordability concerns,²⁵ impact water availability and affordability,²⁶ and exacerbate air pollution and climate emissions.²⁷ Additionally, data centers produce substantial energy, water, and carbon impacts.²⁸ BESS facilities can pose safety concerns such as fires and corresponding emissions.²⁹ Lithium battery fires are extremely difficult to

²¹ Office of Environmental Health Hazard Assessment, CalEnviroScreen 5.0 Technical Report, p. 5 (Dec. 2026) <https://oehha.ca.gov/sites/default/files/media/2026-01/calenviroscreen50techreportd12226.pdf>.

²² Katie King, *Data centers under scrutiny by California lawmakers as fears rise about health and energy impacts*, L.A. Times (Mar. 23, 2026) <https://www.latimes.com/california/story/2026-03-23/data-centers-under-scrutiny-by-california-lawmakers-as-fears-rise-about-health-energy-impacts>. As of the date of the LA publication, Data Center Map, a non-governmental website, lists 289 data centers in California.

²³ Michael Thomas, *California Battery Storage Projects*, Cleanview (Mar. 2026) <https://cleanview.co/battery-storage-projects/california>. As of March 2026, there are 245 utility-scale battery storage projects in California.

²⁴ *H2Hubs ARCHES Award Fact Sheet*, U.S. Dep't of Energy 2 (July 2024)

https://www.energy.gov/sites/default/files/2024-07/H2Hubs%20ARCHES_Award%20Fact%20Sheet.pdf.

²⁵ *Bridging the Equity Gaps in California's Income-Based Electricity Rate Proposal*, The Greenlining Institute (Apr. 24, 2024)

<https://greenlining.org/2024/bridging-the-equity-gaps-in-californias-income-based-electricity-rate-proposal/>.

²⁶ Peter Fairley, *Sizing up Hydrogen's Hydrological Footprint*, Nature (Dec. 14, 2023)

<https://www.nature.com/articles/d41586-023-03884-9>.

²⁷ Mohit Joshi, Ilya Chernyakhovskiy, and Mark Chung, *Hydrogen 101: Frequently Asked Questions About Hydrogen for Decarbonization*, National Renewable Energy Laboratory (July 2022)

<https://docs.nrel.gov/docs/fy22osti/82554.pdf>; *Specific Types of Hydrogen Hub Projects That Could Impact Your Community*, Earthjustice, <https://earthjustice.org/feature/hydrogen-hub-types-impacts>. Nitrogen oxides can aggravate respiratory diseases, particularly asthma.

²⁸ David Nutt, *'Roadmap' Shows the Environmental Impact of AI Data Center Boom*, Cornell Chronicle (Nov. 10, 2025) <https://news.cornell.edu/stories/2025/11/roadmap-shows-environmental-impact-ai-data-center-boom>. By 2030, the current rate of AI growth in the U.S. would annually put 24 to 44 million metric tons of carbon dioxide into the atmosphere. It would also drain 731 to 1,125 million cubic meters of water per year; *see also* Jon Gorey, *Data Drain: The Land and Water Impacts of the AI Boom*, Lincoln Institute of Land Policy (Oct. 17, 2025)

<https://www.lincolninst.edu/publications/land-lines-magazine/articles/land-water-impacts-data-centers/>.

²⁹ U.S. EPA, *Battery Energy Storage Systems: Main Considerations for Safe Installation and Incident Response* <https://www.epa.gov/electronics-batteries-management/battery-energy-storage-systems-main-considerations-safe>.

extinguish and may reignite hours or days later.³⁰ Meanwhile, battery fires can release harmful gases that pose health risks to nearby residents and first responders.³¹

21. The risks posed by these emerging technologies could be mitigated if the locations of proposed developments were included in CalEnviroScreen. To this end, CES would support more informed and democratic decisionmaking as animated by the Precautionary Principle because the public would have more data to participate in local land use decisions.

E. Conclusion

22. CalEnviroScreen 5.0 is already a powerful, place-based tool for identifying communities facing the greatest cumulative pollution burdens and population vulnerabilities, and IHRC supports OEHHA's updates because they improve the tool's ability to capture environmental burdens and health sensitivity.

23. IHRC supports CRLA's suggestions to include additional indicators in CES 5.0. CRLA's comments advocate for including air quality impacts from dairies and other confined animal feeding operations (CAFOs) as a standalone indicator or into relevant Air Quality indicators, adopting an additional indicator regarding the affordability of drinking water, incorporating the most up-to-date available data on groundwater levels into the Groundwater Threats indicator to ensure that CES 5.0 captures the impact of drought and water use, and adding a new indicator considering access to green space.

24. CES 5.0 should also evolve to reflect how local land use decisions shape cumulative exposure over time. By adding an indicator that allows users to map CES results onto each city and county's zoning and general plan framework, OEHHA would give local decisionmakers and the public a clearer picture of how environmental and health burdens align with planning choices. This addition would also strengthen jurisdictions' ability to implement California's environmental justice planning obligations under S.B. 1000 and related state planning laws.

25. Finally, CES 5.0 should support more precautionary and democratic decisionmaking by tracking the locations of proposed facilities using emerging technologies that pose known environmental and public health risks and that are often perceived by EJ communities as being disproportionately sited in already overburdened areas. Some examples of these technologies include data centers, hydrogen facilities, and BESS facilities.

³⁰ U.S. EPA, *Battery Energy Storage Systems: Main Considerations for Safe Installation and Incident Response* <https://www.epa.gov/electronics-batteries-management/battery-energy-storage-systems-main-considerations-safe>.

³¹ U.S. EPA, *Battery Energy Storage Systems: Main Considerations for Safe Installation and Incident Response* <https://www.epa.gov/electronics-batteries-management/battery-energy-storage-systems-main-considerations-safe>. On Jan. 16, 2025, a battery fire occurred at the 300MW BESS facility at Vistra's Moss Landing site in Monterey County, California. On May 15, 2024, a BESS facility in San Diego, California, experienced a fire with continued flare-ups for seven days following the fire.

26. Together, these additions would make CalEnviroScreen a more complete decision-support tool - one that identifies environmental and public health vulnerability, and that helps communities and local governments anticipate compounding harms, evaluate alternatives earlier in the siting process, prioritize protections and investments, and reduce the likelihood of avoidable conflict and costly land-use litigation by promoting better-informed planning decisions from the outset.

With gratitude,

The International Human Rights Clinic, Santa Clara University School of Law