April 1, 2026

Submitted via Comment Submission Portal

RE: Comments on CalEnviroScreen 5.0 Updates

Dear Office of Environmental Health Hazard Assessment (OEHHA) and CalEnviroScreen team:

Leadership Counsel for Justice & Accountability (LCJA) works alongside low-income, disadvantaged, and vibrant communities of color across the San Joaquin and Eastern Coachella valleys to ensure that community residents have a voice in development and investment decisions--decisions which directly impact their environmental health and the severity of pollution burden sought to be measured by CalEnviroScreen (CES) tool. The CES is a valuable tool for identifying communities experiencing the most severe pollution burden and environmental health detriments in California. We commend OEHHA and the CalEnviroScreen team for expanding analysis for indicators like Hazardous Waste Generators and Facilities, adding Small Air Toxin Sites, and having a proactive approach to gathering feedback from stakeholders as changes were being made. To ensure the CalEnviroScreen 5.0 (CES 5.0) accurately depicts the vulnerabilities of disadvantaged communities in the state, we respectfully submit the following comments.

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I. Data Limitations With Respect to Rural Communities

We remain concerned about the accuracy of representation of vulnerable rural communities as a result of data gaps and potential imprecision of certain data sets as indicators of conditions in rural areas. First, in rural areas, the use of large census tracts may obscure the particular vulnerabilities of small rural communities. In our comments on OEHHA's draft CalEnviroScreen 3.0 and 4.0, we proposed that OEHHA consider separating out census block groups and census designated places (many of which are unincorporated communities) from the larger census tracts that surround them, so that their particular vulnerability can be accurately represented, while still accounting for factors in the surrounding land in rural communities including but not limited to heavy agricultural activities. For example, Riverside County's district four experiences a stark difference across the district's communities among various factors reflected in the CalEnviroScreen that lead to smaller disadvantaged unincorporated communities being inadequately represented. ProPublica's *Unlivable Oasis* documentary provides examples of this issue.[1]

[1] Rodríguez, Mauricio. "Unlivable Oasis." *ProPublica*, 24 Aug. 2021, www.propublica.org/video/unlivable-oasis.

Additionally, we ask that OEHHA include in the final report an assessment of the extent to which these and other potential data gaps and inaccuracies with respect to rural areas individually and cumulatively impact the draft CES 5.0's scoring of rural communities. We ask that this assessment also determine whether improvements may be made to these data sources to ensure scores reflect the conditions of rural communities. We also suggest that OEHHA identify and prioritize data needs which would improve the tool's accuracy with respect to rural communities, so that agencies, the public, and legislators can consider options and resources required for creating new sources of data.

II. Indicator Recommendations

Drinking Water, Groundwater, and Impaired Waters Indicators

Communities in the heavy agricultural regions of the San Joaquin & Eastern Coachella Valleys are disproportionately burdened by contaminated and/or inaccessible water sources. We commend OEHHA for incorporating multiple contaminants, including Per- and Polyfluoroalkyl Substances (PFAS), in the calculations to determine contamination levels. However, the analysis overlooks a key driver of contamination and access to water: declining groundwater levels.[2] The communities that our organization supports are heavily and, oftentimes, solely reliant on groundwater. As such, groundwater levels are a major concern for many communities given their increased exposure to toxic contaminants, such as nitrates and arsenic, as levels decrease. We recommend incorporating groundwater levels into the drinking water indicator using the Groundwater Sustainability Plan (GSP) well monitoring data, as submitted by Groundwater Sustainability Agencies (GSAs) to the Department of Water Resources (DWR) during the implementation of their GSPs and California Statewide Groundwater Elevation Monitoring (CASGEM) data.

To further capture and display the communities most burdened by drinking water contaminants, we also suggest the integration of risk assessment data on small state water systems and domestic wells, as collected by the State Water Resources Control Board (SWRCB) in its annual Drinking Water Needs Assessment. Small state water systems and domestic wells are particularly vulnerable to lowering groundwater levels and drought conditions.[3] Thus, increasing the risk of exposure to contaminated water among already vulnerable communities, along with domestic wells running dry.[4] Additionally, as per our previous suggestions, the drinking water indicator and impaired water bodies indicator should reconsider its calculus of pollutants to include insufficient surface flow into account. This is becoming an increasingly

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[2] Haugen, Emily A., et al. "Groundwater development leads to decreasing arsenic concentrations in the San Joaquin Valley, California." *Science of the Total Environment 771* (2021): 145223.; Kawagoshi, Yasunori, et al. "Understanding nitrate contamination based on the relationship between changes in groundwater levels and changes in water quality with precipitation fluctuations." *Science of the Total Environment 657* (2019): 146-153.

[3] Pauloo, Rich A., et al. "Domestic well vulnerability to drought duration and unsustainable groundwater management in California's Central Valley." *Environmental Research Letters 15* 044010 (2020).; Jasechko, Scott & Perrone, Debra. "California's Central Valley groundwater wells run dry during recent drought." *Earth's Future, 8*,e2019EF001339 (2020).

[4] Levy, Zeno F. et al. "Critical aquifer overdraft accelerates degradation of groundwater quality in California's Central Valley during drought." Geophysical Research Letters,48, e2021GL094398 (2021).

important concern as surface water flows continue to be impacted by increased use and the strain of drought on surface flows. It also appears that data from the National Water-Quality Assessment data for Total Maximum Daily Loads produced by the USGS is missing and should be included in the impaired water bodies indicator.

Last, we recognize the substantial efforts of the OEHHA and the CalEnviroScreen Team in calculating the drinking water contamination indicator and want to stress the importance of having this indicator display whether water is safe to consume in a given geographic area. Currently, no reasoning is provided as to why the drinking water contamination indicator for CES 5.0 does not suggest water safety, despite using several data sources with information on contaminant violations. We believe this indicator and mapping tool as a whole can be strengthened by determining drinking water safety based on the data that is already being used to calculate contamination levels in a water system.

Energy Reliability, Energy Efficiency, and Extreme Heat Indicators

About one-fourth of households across the United States face high energy burdens, spending more than 6% of their income on energy, with low-income households often spending as much as 20%.[5] These challenges are disproportionately experienced by communities of color, renters, rural households, and people living in older or poorly maintained homes. All of these conditions are prevalent in the communities across the San Joaquin and Eastern Coachella valleys.

Many homes across these regions are older site-built homes or mobile homes, which are poorly insulated and require more energy to maintain a safe indoor temperature. As a result, households use more energy while still experiencing unsafe or uncomfortable conditions, often without access to alternative shelter such as a cooling center. As electricity bills increase exponentially, households are forced to make difficult financial decisions between staying relatively cool and affording other essential needs. Additionally, energy reliability is a concern across the San Joaquin and Eastern Coachella valleys, where frequent power outages, often happening during extreme heat, disrupt daily life and impact communities in various ways including food spoilage, damaged appliances, and increased health and safety risks.

We recommend adding three indicators around these matters. One, on energy reliability that demonstrates factors such as grid capacity and frequency and duration of power outages. Second, on energy affordability that looks at the percentage of income spent on energy. Lastly, on housing quality and energy efficiency, that looks at the type and age of housing in the region. Relevant data sources may include but are not limited to the California Public Utilities Commission Electric System Reliability Annual Reports[6] and the California Energy Commissions EVSE Deployment and Grid Evaluation (EDGE) Tool.[7]

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[5] Just Solutions Collective. Pathways for Action: Affording Our Clean Energy Future. October 2025.

[6] California Public Utilities Commission. *Electric System Reliability Annual Reports.* Electric System Reliability Annual Reports.
https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/infrastructure/electric-reliability/electric-system-reliability-annual-reports

[7] California Energy Commission. EVSE Deployment and Grid Evaluation (EDGE) Tool (ver 1.0).
https://experience.arcgis.com/experience/6aaadc11586447aaaeab2a473947ad07

Air Quality

As per our comments for Calenviroscreen 4.0, we continue to recommend that data from non-CARB and community air monitoring networks be incorporated into CalEnviroScreen's calculations. Numerous organizations have received CARB community air grants to set up local air monitoring networks, including in the San Joaquin Valley, and we would like to ensure that the data created from these local community organization-operated monitoring networks are incorporated into CalEnviroScreen. We additionally ask that the Ozone and PM 2.5 layers visually display which census tracts did not have an air monitor within 50 kilometers of them, and therefore relied on data from a neighboring census tract data. This should be visually displayed for other indicator maps where neighboring census tract data is used in the methodology too, as it will help inform agencies and advocates about where more monitoring and data collection are needed in the state.

Considering Other Housing Conditions As Potential Indicators

We appreciate the continued incorporation of the Children's Lead Risk from Housing indicator. We want to note that, in addition to lead-based paint, unsafe and unhealthy housing conditions, especially in rental housing, have significant health impacts on low-income renters and residents of disadvantaged communities in California. Some of these conditions which are prevalent in disadvantaged communities in the San Joaquin and East Coachella valleys include mold, vermin, pests, structural deterioration, inadequate or lacking heating or cooling systems, and inadequate and aging water or wastewater infrastructure. While such data may not be readily available at the statewide level, we encourage OEHHA to consider the merit of including additional indicators reflecting the contribution of housing conditions to pollution-burden and resident vulnerability in subsequent versions of CalEnviroScreen, as well as the availability of data that accurately reflects those conditions in communities across California and data sources which might be needed.

III. Utilization of 2020 Census Data

We have concerns that the 2020 Census data does not accurately represent disadvantaged communities in the state. We recommend OEHHA carefully evaluate the implications of using 2020 Census data for CES 5.0 and assess whether 2020 Census data alone provides an accurate representation of local racial and ethnic compositions in specific geographical areas. We recommend OEHHA supplement its analysis with state-collected race and ethnicity data, where available, and consider methodological adjustments or validation steps that demographic indicators used in CES 5.0 to remain consistent, reliable, and reflective of local community demographics.

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We look forward to working with OEHHA and the CalEnviroScreen Team to ensure CES 5.0 accurately reflects the severe vulnerabilities in the San Joaquin Valley and Eastern Coachella Valley regions of California, so that adequate funds can be devoted to mitigating and preventing harms to these communities and addressing their disproportionate pollution burden. We welcome the opportunity to provide further or discuss the feedback provided with OEHHA and the CalEnviroScreen Team.

Sincerely,

Claudia Valencia Uribe, PhD
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Leadership Counsel for Justice & Accountability