



August 12, 2026

To: California Environmental Protection Agency (CalEPA) Office of Environmental Health Hazard Assessment (OEHHA)

From: The Healthy Communities Work Group

RE: CalEnviroScreen 5.0

Dear CalEPA OEHHA team,

The [Healthy Communities Work Group](#) is a collaboration between public health officials, local planning and transportation officials, community-based organizations, academia, and community members. Together, we work to improve health outcomes through community design by providing research-informed, evidence-based recommendations on land use projects, ordinance and general plan amendments, and other planning efforts.

Since 2012, the group has reviewed hundreds of projects affecting community health and has served as the primary work group for the Healthy Neighborhoods priority in San Luis Obispo County's [Community Health Improvement Plan](#). Through this work, we have developed a deep understanding of the environmental, social, and economic conditions that shape health across our communities.

First and foremost, we understand the difficulty of pulling together a data model that identifies disadvantaged communities across a state as large and diverse as ours. We recognize this is made even more complex by the often imperfect or incomplete available data. Our Public Health partners talk about these issues often and it comes up quite frequently in our group's discussions.

At the same time, our work throughout San Luis Obispo County has demonstrated that local knowledge often reveals vulnerabilities that statewide datasets cannot fully capture. This local knowledge is difficult to incorporate into a standardized model, but it makes it no less important.

For our county, the proposed CalEnviroScreen 5.0 methodology, and its reliance on census data, underrepresents populations that have historically been undercounted. These include farmworkers, immigrant communities, and residents who primarily speak languages other than English, particularly Spanish and Mixteco. These populations often experience some of the state's greatest environmental burdens, including pesticide exposure and extreme

heat associated with agricultural work, yet are less likely to be accurately reflected in census data.

Recognizing this gap, our Public Health Department [funded a study](#) on the county's Mexican Indigenous community to better understand where these populations live and the environmental and social burdens they experience. This type of locally generated information provides critical context that cannot be captured through census data alone.

We have also observed limitations in relying on census tract boundaries. In San Luis Obispo County, census tracts vary dramatically in size and composition. While some communities are represented by relatively discrete tracts, others combine dense town centers with extensive rural areas that have very different demographic and socioeconomic characteristics.

One example is the community of San Miguel. Although the main town has some of the highest poverty in the county (historically reaching [over 90% of the local student population](#)), it shares a census tract with 105 square miles to the East – land with much larger landowners and ranchers. This creates underserved communities that are prime for investment yet will never see the investments the state's Cap-and-Invest Program was created to provide.

Our local experience consistently identifies the same communities as facing the greatest challenges. Over many years, our work group [has documented](#) these patterns through project reviews, community engagement, and health data analysis. Similar findings have emerged from the San Luis Obispo Council of Governments' [sub-census tract analysis](#) and from discussions with local nonprofit partners, including One Cool Earth. Across these efforts, communities such as San Miguel, Shandon, Oceano, and Nipomo consistently emerge as places with significant unmet need.

For these reasons, we encourage OEHHA to consider supplementing the CalEnviroScreen methodology with additional mechanisms for identifying disadvantaged communities in counties where census tract data does not accurately reflect local conditions. This could include incorporating locally validated analyses into CalEnviroScreen and/or adopt categorical SB 535 designation pathways, allowing for county consultation in specific circumstances, or considering additional datasets, such as school-based socioeconomic indicators from the [California Department of Education](#), which often provide a more accurate representation of need in medium-sized and rural counties. For methodology update recommendations, Healthy Communities Work Group recommends that OEHHA and CalEPA reference the letter submitted by [One Cool Earth](#).



While we recognize the importance of maintaining a consistent statewide methodology, we believe targeted flexibility would improve the accuracy of CalEnviroScreen without compromising its integrity. Most importantly, it would help ensure that Cap-and-Invest resources reach the underserved communities for which they were intended.

Thank you for the opportunity to provide comments on CalEnviroScreen 5.0. We appreciate your consideration and your continued commitment to improving California's environmental justice tools.

Sincerely,

Bob Jorgensen, Healthy Communities Work Group Chair