UNIDOS Network, Inc.

Public Comment

2026 Preliminary Disadvantaged Community Designation

California Environmental Protection Agency | August 14, 2026

Submitted to:	California Environmental Protection Agency
Re:	2026 Preliminary Disadvantaged Community Designation: Public Comment Period
Submitted by:	Brian Cadena, Chief Operations Officer, UNIDOS Network, Inc.
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Dear California Environmental Protection Agency Leadership and CalEnviroScreen Team,

Thank you for the opportunity to submit public comment on the 2026 Preliminary Disadvantaged Community Designation. UNIDOS Network, Inc. is a community-based nonprofit headquartered in Kettleman City, California, serving rural, predominantly Latino and Spanish-speaking communities in California's Central Valley. We have had the privilege of participating in the CalEnviroScreen 5.0 Co-Design process and are deeply invested in ensuring that the Disadvantaged Community designation framework accurately reflects the full scope of burden experienced by California's most vulnerable communities.

We submit this comment in a spirit of collaboration and with deep respect for the work CalEPA and the Office of Environmental Health Hazard Assessment have done to build a more equitable and data-informed designation process. Our comments are offered as a constructive contribution to that shared goal.

COMMENT:

THE 2026 DISADVANTAGED COMMUNITY DESIGNATION FRAMEWORK SHOULD EXPLICITLY ACCOUNT FOR RURAL UNINCORPORATED COMMUNITIES AND URBAN COMMUNITIES WITHOUT GOVERNING STRUCTURES

I Background and the Gap We Are Raising

The 2026 Preliminary Disadvantaged Community Designation represents a significant step forward in California's environmental justice policy, incorporating CalEnviroScreen 5.0 data, updated census tract geography, and a co-design process that meaningfully engaged community-based organizations. We commend CalEPA for this progress.

However, we respectfully call attention to a structural gap in the current designation framework that, if left unaddressed, will continue to result in the systematic underrepresentation of two categories of communities that are among California's most burdened:

- Rural unincorporated communities across California; and
- Urban communities that lack a formal governing structure, communities that, like rural unincorporated areas, cannot independently access, apply for, or administer infrastructure and public health funding.

Kettleman City, where UNIDOS Network is headquartered, is one such community. It is a small, unincorporated town of approximately 1,000 residents in Kings County, over 95 percent Latino and predominantly Spanish-speaking. Kettleman City has no city council, no incorporated government, and no dedicated administrative infrastructure through which to pursue competitive grants or capital improvement programs independently.

Despite this, our community carries an extraordinary pollution and health burden, as confirmed by CalEnviroScreen 5.0:

Indicator	Kettleman City, Census Tract 16.01, Kings County
CalEnviroScreen 5.0 Overall Score	92.98th percentile statewide
Pollution Burden	94.07th percentile
Drinking Water Contaminants	91.69th percentile, with an active Total Trihalomethanes Maximum Contaminant Level violation confirmed in the 2025 Consumer Confidence Report
Poverty	96.73rd percentile
Educational Attainment	96.28th percentile
Linguistic Isolation	92.90th percentile
Diabetes Prevalence	92.66th percentile
Recreational Infrastructure	No parks, no recreational facilities, no public spaces for youth and families

Kettleman City qualifies as a Disadvantaged Community under the current CalEnviroScreen-based criteria. But qualifying on paper is not the same as receiving investment. Without a governing body to receive and administer funds, many Cap-and-Invest funding mechanisms remain inaccessible in practice.

II Policy Concern: Designation Alone Does Not Guarantee Access to Investment

Senate Bill 535 and Assembly Bill 1550 established the intent that Disadvantaged Community designation translate into real investment in the communities that carry the highest burdens. Assembly Bill 1550 requires that at least 25 percent of Cap-and-Invest proceeds be directed to Disadvantaged Communities, with additional minimums for low-income communities within and adjacent to those areas.

We recognize that CalEPA's role in this framework is primarily to designate communities; the investment and allocation decisions rest with other agencies and programs. However, we believe CalEPA is well-positioned to raise and elevate this structural access gap within the broader CalEPA-led policy conversation, and we respectfully request that it do so.

Specifically, we ask CalEPA to consider the following:

1. Formally recognize in the 2026 Disadvantaged Community Designation documentation that rural unincorporated communities and ungoverned urban communities face structural barriers to accessing Cap-and-Invest investments, even when they meet designation criteria.

2. Recommend to relevant state agencies and the California Air Resources Board that funding programs include flexible eligibility and administrative pathways for Disadvantaged Communities without incorporated governing structures, including allowance for community-based organizations, counties, or regional partners to serve as fiscal and administrative sponsors.

3. Consider establishing a dedicated reporting mechanism or interagency working group to track whether Disadvantaged Community designations are resulting in actual investment in rural unincorporated communities, and to surface where the gap between designation and investment is largest.

4. In future updates to CalEnviroScreen and the Disadvantaged Community designation framework, consider incorporating governance capacity as a contextual factor, not to lower designation thresholds, but to flag communities where additional policy support is needed to ensure that designation translates into delivered benefit.

III The Broader Pattern Across California

Kettleman City is not alone. Across California's Central Valley, rural unincorporated communities, many of them small, Latino, Spanish-speaking, and economically isolated, face this same structural gap. Communities like Tooleville, Lanare, Cantua Creek, El Rancho, and others carry significant environmental and health burdens but lack the institutional infrastructure to compete for or administer major state investments on their own. The same pattern exists in ungoverned urban communities that are politically invisible despite their environmental burden.

California's Cap-and-Invest framework was designed to reach the communities that have been most left behind. We believe that with intentional policy design, it can do exactly that, but only if the framework explicitly accounts for the structural conditions that currently prevent investment from reaching the front door of the communities that need it most.

IV Conclusion

> *We offer these comments not as criticism, but as an invitation: to work together toward a policy framework that ensures designation means delivery.*

UNIDOS Network is committed to working alongside CalEPA, the Office of Environmental Health Hazard Assessment, and our co-design partners to strengthen the CalEnviroScreen and Disadvantaged Community designation framework over time.

We appreciate your consideration and welcome any opportunity to discuss these recommendations further. Please do not hesitate to contact me directly.

Respectfully submitted,

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