



November 22, 2021

California Public Utilities Commission  
505 Van Ness Ave  
San Francisco, CA 94102

*Submitted via email to: [ESJActionPlan@cpuc.ca.gov](mailto:ESJActionPlan@cpuc.ca.gov)*

**RE: Comment Letter—Environmental Justice and Social Justice Action Plan**

President Batjer and CPUC Commissioners,

On behalf of Russian Riverkeeper (RRK), I welcome the opportunity to submit these comments in support of the “California Public Utilities Commission’s Environmental & Social Justice Action Plan.” Russian Riverkeeper is a local nonprofit that has been successfully protecting the Russian River watershed since 1993. Through public education, scientific research and expert advocacy, RRK has actively pursued conservation and protection for the River’s mainstem, tributaries and watershed for all people and animals. Our mission is to inspire the community to protect their River home, and to provide them with the tools and guiding framework necessary to do so. We value equity, environmental justice, diversity, and inclusion at all levels of our organization and support efforts to strengthen these values across all California communities. For these reasons we submit the following comments.

**I. Support for Environmental Justice and Social Justice Action**

The Environmental Justice and Social Justice Action Plan is a critical first step towards achieving improved outcomes for historically marginalized BIPOC (black, indigenous, people of color) communities of both past and present day. Many existing water utility systems are still ingrained with racism, and outdated policies must be revisited with a fresh lens that considers the needs and interests of BIPOC communities. Access to clean drinking water is not equal across California, and often, it is our Native American, Latinx and Black communities that are forced to carry the health and financial burdens of polluted water. We appreciate the commitment and progress you have made, and look forward to seeing more beneficial action items in the near future.

In our own environmental justice research, we have observed clear patterns of environmental racism in BIPOC communities such that across all levels of governance there is obstruction to clean water access. Even when looking across the span of a single watershed, like the Russian River, these patterns of environmental racism are clear. For instance, there is a strong correlation between where a BIPOC community is located and the presence of poor drinking water quality with high levels of pollution that are not found to the same degree elsewhere. For instance, we have observed higher concentrations of unhealthy pollutants in groundwater samples near vineyards and other agriculture areas where many workers are known to face inequitable health burdens as a result. This is particularly unacceptable as these impacts fall heaviest on our local Latino population that works, resides, and sources their drinking water from wells on vineyard property.



Thus, we suggest the Commission continue to look at ways that would allow for more regional nuance so that systems can mold to local issues more effectively. This includes the inclusion of local tribes and native persons in key roles when determining how plans move forward, especially in areas of ancestral significance. It is also important to acknowledge CPUC's own history and the role that has been played in leading us to today's current circumstances and inequalities. This includes more thoroughly examining water affordability, access, and climate resilience; the role of economic considerations and pressures; politics; and other problematic structures that continue to persist. For example, the CPUC could provide more opportunities to consolidate small water systems with larger municipal systems nearby in order to increase access for ESJ communities while making water rates more equitable.

Furthermore, we suggest draft versions, workshops, hearings, notices, and related announcements be translated and offered in additional languages so as to reflect our diverse California communities. To obtain meaningful participation in CPUC's decision making process, accessibility to the commenting process and proceedings should be a top priority. According to census data, over 30% of households are speaking a language other than English as their primary in the home, with Spanish speakers leading this figure. Combined with the knowledge that it is often non-English speakers that are on the ground experiencing environmental injustices first hand, efforts to include other voices is paramount.

The CPUC is not always going to be making popular decisions and that fact must be accepted. It is the CPUC's job to "regulate essential utility services to protect consumers and safeguard the environment, assuring safe and reliable access for the benefit of all persons in California." Making exceptions does not further this duty and only contributes to inequities across wealth and race, with many negative impacts burdening BIPOC communities the most.

## II. Conclusion

Thank you for all of your hard work in ensuring the CPUC is actively growing and moving forward in the process to achieve true environmental and social justice. We are looking forward to a future where the State's water management is implemented in such a way that: past wrongs are righted, actions are truly restorative, and both existing and future harms are not allowed to persist. All California residents deserve to enjoy and benefit from clean and healthy waters.

We appreciate the opportunity to provide comment and welcome any questions that you may have.

Sincerely,

A handwritten signature in black ink that reads "Ariel Majorana".

Ariel Majorana  
Environmental Justice Outreach Specialist  
Russian Riverkeeper

A handwritten signature in black ink that reads "Don McEnhill".

Don McEnhill  
Executive Director  
Russian Riverkeeper