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May 14, 2021

Secretary Jared Blumenfeld California Environmental Protection Agency 1001 I Street P.O. Box 2815 Sacramento, CA 95812

Re: Draft CalEnviroScreen 4.0

Dear Secretary Jared Blumenfeld,

With heightened visibility around anti-Asian violence, the state's leadership is needed to highlight these struggles and raise visibility for all our communities. The newly proposed Draft CalEnviroScreen (CES) 4.0 has the ability to bring visibility to Asian and Pacific Islander (API) issues instead of excluding key frontline communities in San Francisco. The API Council, which represents 57 nonprofit organizations serving API communities, calls upon the California Environmental Protection Agency and California Office of Environmental Health Hazard Assessment to improve Draft CES 4.0 to reflect the extraordinary need of our communities. Only until we accurately map and recognize our frontline communities will we be able to craft equitable programs and policies.

The proposed Draft CES 4.0 excludes neighborhoods with significant API populations previously recognized as "Disadvantaged Communities" (DACs) in CES 3.0. These San Francisco neighborhoods include SoMa (39.2%), Tenderloin (31.4%), and Mission (14.2%).¹ Many of the census tracts in these neighborhoods do not meet the DAC classification cutoff but continue to face disproportionate environmental and socioeconomic burdens. Additionally, none of Chinatown's census tracts, with an 81% API community, are classified as DACs. All Chinatown census tracts face persistent socioeconomic issues with poverty, housing burden, education, and linguistic isolation exceeding the 99th percentile.² Chinatown also suffers from serious pollution

¹ San Francisco Neighborhoods Socio-Economic Profiles: American Community Survey 2012-2016, San Francisco Planning (September 2018), https://default.sfplanning.org/publications_reports/SF_NGBD_SocioEconomic_Profiles/2012-2016_ACS_Profile_Neighborhoods_Final.pdf. ² Draft CalEnviroScreen 4.0 (February 2021), Distributed by California Office of Environmental Health Hazard Assessment, https://oehha.ca.gov/media/downloads/calenviroscreen/document/ calenviroscreen40resultsdatadictionaryd12021.zip.

burdens, with many indicators falling in the top quintile in the state.³ Draft CES 4.0 fails to bring visibility to the historical and persistent issues faced by these neighborhoods.

Excluding underserved API communities hinders our ability to adequately raise awareness and address persistent community issues. CES 4.0 has the opportunity to give visibility to issues that Asian and Pacific Islander communities face by improving Draft CES 4.0 to map frontline community needs accurately.

Sincerely,

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Cally Wong API Council

³ CalEnviroScreen 3.0 Results (Jun 25, 2018), Distributed by California Office of Environmental Health Hazard Assessment, https://oehha.ca.gov/media/downloads/calenviroscreen/document /ces3results.xlsx