



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,

Our coalition represents 21 community-based organizations that serve and represent frontline communities. For decades, our organizations have worked on environmental justice issues through housing, parks, education, workforce development, community organizing, renewable energy installation, food security, social services, and so much more. In affordable housing alone, our coalition represents a combined portfolio of 138 properties and over 17,500 low-income tenants. Our coalition also serves over 8,000 low-income and at-risk youth, over 10,000 job trainees and small businesses, and over 40,000 older adults each year in San Francisco, San Mateo, Santa Clara and Alameda counties.

Since 2013, CalEnviroScreen (CES) has been used to map “Disadvantaged Communities” across the state, and this definition has directly influenced more than \$12.7 billion in funding, 20 state agencies, and 68

environmental programs.<sup>1</sup> Due to repeated use in state legislation and regulatory policy, this mapping tool and definition have evolved from targeting equity in cap-and-trade funding to being the *de facto* state definition applied to many equity-oriented policies beyond the environment.

Unfortunately, the newly proposed Draft CES 4.0 represents a step backward for San Francisco's communities of need. For instance, while previously recognized under CES 3.0, the Tenderloin and most of South of Market (SoMa) now fall out of the state's "Disadvantaged Communities" (DACs) definition in Draft CES 4.0. While Treasure Island and Bayview-Hunters Point remain in the definition, the Mission District and Chinatown still do not qualify as DACs despite deepening need demonstrated through population characteristics and pollution burdens. Especially as visibility around anti-Asian violence has swept the country in the last few months, it has become essential to map the need in neighborhoods severely isolated by the pandemic, wildfires, food insecurity, and scarce resources. Now more than ever, the state's leadership is needed to highlight these struggles and raise visibility for all our communities.

I. The Tenderloin loses resources and programs by no longer qualifying as a "Disadvantaged Community" under Draft CES 4.0.

With a dense population of 33,000 people per square mile and soaring rates of poverty during the pandemic, the Tenderloin has long struggled with serious environmental and socioeconomic burdens that are not adequately captured by Draft CES 4.0.<sup>2</sup> Under CES 3.0, only two of the eight census tracts in the Tenderloin were classified as Disadvantaged Communities. But under Draft CES 4.0, not a single census tract scores in the top quartile (the threshold used by CES 3.0 to qualify as a Disadvantaged Community) despite worsening conditions indicated by the screening tool itself.

Concentrated in the Tenderloin, Single-Room Occupancy buildings ("SROs") also highlight the community need as low-income tenants in these buildings face unique environmental injustices. As essential housing for San Francisco's low-income populations, SRO rooms (typically 8 x 10 feet in size) are often overcrowded with large families with children, and have shared kitchen and bathroom facilities. While overall population characteristics in the Tenderloin show slight improvement relative to the state's ranking under Draft CES 4.0, SRO communities have been under siege, especially during the pandemic, catastrophic 2020 wildfires, and widespread food insecurity.

II. South of Market no longer qualifies as a Disadvantaged Community under Draft CES 4.0.

South of Market (SoMa) bears the region's worst vehicular congestion, emissions, and pollutants as I-80 and US Highway 101 services both the East Bay and the South Bay and cuts through the neighborhood. As such, pollution risk and other environmental and socioeconomic factors persist as a serious threat in SoMa. But Draft CES 4.0 disqualifies both of SoMa's census tracts that were previously in the top quartile under CES

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<sup>1</sup> *Annual Report to the Legislator on California Climate Investments Using Cap-and-Trade Auction Proceeds*, California Climate Investments, March 2020. [https://www2.arb.ca.gov/sites/default/files/classic/cc/capandtrade/auctionproceeds/2020\\_cci\\_annual\\_report.pdf](https://www2.arb.ca.gov/sites/default/files/classic/cc/capandtrade/auctionproceeds/2020_cci_annual_report.pdf)

<sup>2</sup> *San Francisco, California Neighborhood Map - Income, House Prices, Occupations, Boundaries*, Urban Mapping Inc. (April 12, 2021), <https://www.city-data.com/nbmaps/neighbor-San-Francisco-California.html#N76>.

3.0, while giving one of its other census tracts a score that barely exceeds the 75th percentile.<sup>3,4</sup> As with the Tenderloin, Single-Room Occupancy (SRO) buildings are also common in SoMa, reinforcing the needs of San Francisco's underhoused and most vulnerable populations.

### III. Chinatown deserves greater consideration under Draft CES 4.0.

Given visibility around anti-Asian violence throughout March 2021, the Governor visited San Francisco Chinatown on March 19, 2021 to discuss increased resources for Asian-Pacific Islander communities. Unfortunately, Chinatown has become emblematic of Draft CES 4.0 shortfalls in addressing urban environmental justice issues. Both Draft CES 4.0 and CES 3.0 indicate extreme population disadvantages in Chinatown, despite not classifying any of its four census tracts as a Disadvantaged Community. Population characteristics including poverty, housing burden, education, and especially linguistic isolation exceed the 99th percentile in all of Chinatown's census tracts.<sup>3</sup> Chinatown also suffers from serious pollution burdens, as hazardous waste, impaired water, and diesel all fall within the top quintile.<sup>3</sup> As other less relevant environmental indicators skew their composite score, all of Chinatown's four census tracts still score below the top quartile despite some of the worst conditions in the state.

### IV. The Mission District deserves greater consideration under Draft CES 4.0.

In the Mission District, needs are varied across its thirteen census tracts, as Draft CES 4.0 percentiles range from 15 to 74 (just below the cutoff), averaging just about the median.<sup>3</sup> However, common threats that place the Mission District in the top quartile include asthma, drinking water, groundwater, and lead from housing.<sup>3</sup> In addition, categories including unemployment, linguistic isolation, low birth weight, asthma, groundwater threats, and toxic releases, all show significant net increases under Draft CES 4.0. Socioeconomic and environmental threats persist and are worsening in both the Mission District and Chinatown, and yet not a single census tract in these neighborhoods qualifies as a Disadvantaged Community.

### V. Draft CES 4.0 should also analyze other maps that better map communities of need in San Francisco, including but not limited to Western Addition, Visitacion Valley, and more.

Two other maps and classification tools used by local and regional agencies might help the State of California become better at mapping equity, such as the San Francisco Planning Department's recently issued draft Environmental Justice (EJ) Communities Map or the Metropolitan Transportation Commission (MTC)'s "Communities of Concern" map.

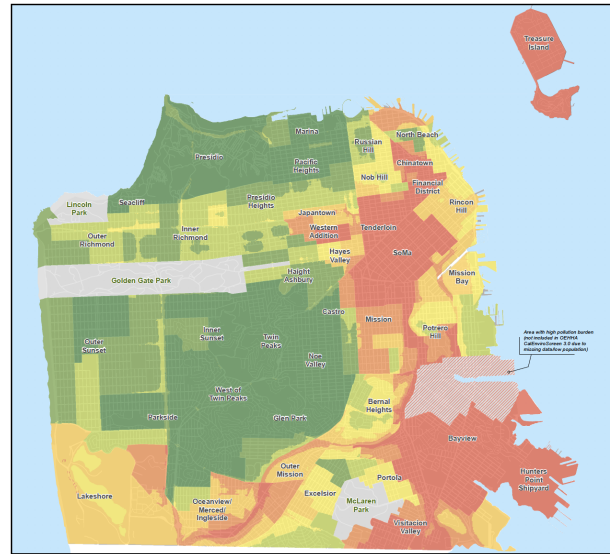
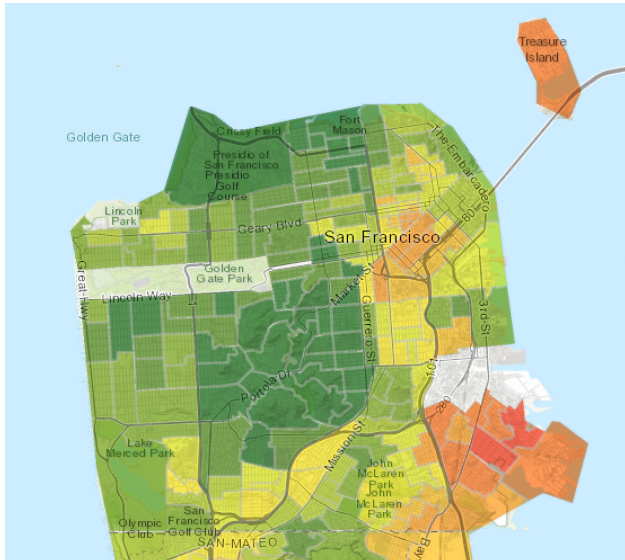
While utilizing CES data, San Francisco's draft EJ Communities Map also utilizes local data on pollution and demographics while drawing on community feedback to include more neighborhoods, such as Western Addition and Potrero Hill.<sup>5</sup> The maps on the next page demonstrate the large gaps in Draft CES 4.0.

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<sup>3</sup> *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>.

<sup>4</sup> *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>

<sup>5</sup> *Environmental Justice Framework and General Plan Policies*, San Francisco Planning (April 12, 2021), <https://sfplanning.org/project/environmental-justice-framework-and-general-plan-policies#ej-communities>.



Sources: Draft CalEnviroScreen 4.0 Map (left) and draft EJ Communities Map by the SF Planning Department (right)

In 2016, the Metropolitan Transportation Commission (MTC) proposed an updated definition which diversified its criteria to better reflect equity and need throughout the Bay Area region. This map includes appropriate environmental justice communities of San Francisco, including but not limited to the Tenderloin, SoMa, Chinatown, Mission District, Visitacion Valley, Bayview-Hunters Point, and Western Addition.<sup>6</sup>

## Recommendations

### 1. Weight and Refine Indicators to Adequately Reflect Environmental Justice in the Bay Area.

- a) Diesel particulate matter should be accorded greater weighting. Diesel scores are extremely high in Bayview-Hunters Point, Chinatown, the Mission District, SoMa, and the Tenderloin, averaging above the 96th percentile across census tracts. As Draft CES 4.0 weights the eight exposure indicators equally amongst themselves, there should be correction in the calculation of Draft CES 4.0 scores that ensure high diesel scores are appropriately reflected.
- b) Socioeconomic factors should be weighted more in CalEnviroScreen. The formula for calculating the CES score should place greater emphasis on social and economic factors as they are critical in assessing public health disadvantage, and would allow more census tracts in Chinatown to qualify (for instance, Education, Linguistic, Poverty, and Housing Burden indicators in SF Chinatown and adjacent areas typically range from 90 to 100th percentile).<sup>7</sup>
- c) Pollution indicators should be weighted by population density. Because of the smaller census tracts in urban areas, census tracts in these areas tend to be underrepresented in pollution

<sup>6</sup> MTC Resolution No. 4217: Equity Framework for Plan Bay Area 2040 (January 19, 2016) Doug Johnson, MTC and Pedro Galvao, ABAG, <https://mtc.legistar.com/View.ashx?M=F&ID=4216344&GUID=0031F3B4-C6CF-43CD-A078-C86CC2896C74>.

<sup>7</sup> The high scores in socioeconomic factors for Chinatown and its adjacent areas (census tracts 6075011800, 6075011300, and 6075010700\_ reflect the unique racism and xenophobia that have shaped the community. Available at: <https://oehha.ca.gov/calenviroscreen/report/draft-calenviroscreen-40>

burden rankings. Population density as an indicator or a population density weight may better help assess burdens and exposures in urban communities.

- d) Additional indicators should be included and weighted that better align CES 4.0 with SF Planning Department's SB 1000 Environmental Justice Map. New indicators may include housing burdens specific to the Bay Area, overcrowded housing, substandard housing (e.g. without plumbing, kitchen, bathroom facilities), and sea level rise.
  - e) Refine data, particularly PM 2.5 data used in Draft CES 4.0. Draft CES 4.0 should include air quality data from the Air Pollution Exposure Zone, which includes high impact exposure areas in San Francisco. Rigorous modeling based on both traffic related and static sources of air pollution shows that significant areas in San Francisco have levels of air pollution that are hazardous to health, with PM 2.5 concentrations ranging from 8 to over 18ug/m<sup>3</sup>.
3. Identify environmental justice communities by specific indicators, rather than a composite formula. As CES has long struggled to capture environmental justice issues in the Bay Area region, CalEPA should define communities by individual indicators, rather than the composite score of 21 indicators that creates systemic bias against frontline communities in the Bay Area. For instance, the inclusion of 32 new pesticides has heavily skewed the statewide ranking for rural communities, but does not include nonagricultural pesticides, creating a bias against urban environmental justice communities. In designating "Disadvantaged Communities," CalEPA should exercise its discretion to incorporate census tracts that score highly in areas such as socioeconomic factors or environmental effects.<sup>8</sup> This would include Bayview-Hunters Point, Chinatown, the Mission District, SoMa, and the Tenderloin, as well as many more Bay Area frontline communities that are unintentionally excluded.
  4. Establish a new tool to improve the state's understanding of "Disadvantaged Communities." Should the previous recommendations fail to improve Draft CES 4.0, the California Environmental Protection Agency could create another tool beyond CalEnviroScreen solely focused on socioeconomic factors that capture the Bay Area's frontline communities.<sup>9</sup>

## Conclusion

We call 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, including but not limited to Chinatown, Mission District, South of Market, and the Tenderloin. In order for

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<sup>8</sup> Precedent for this exists in 2017, when CalEPA included census tracts that scored in the top 5th percentile for pollution factors even if they fell short of the 75th percentile overall. Moreover, California Health and Safety Code Section 39711, established by SB 535 (DeLeon, 2011) gives CalEPA this discretion on criteria for DACs that "may include, but are not limited to, **either** of the following: (a) Areas disproportionately affected by environmental pollution and other hazards that can lead to negative public health effects, exposure, or environmental degradation. (b) Areas with concentrations of people that are of low income, high unemployment, low levels of homeownership, high rent burden, sensitive populations, or low levels of educational attainment."

<sup>9</sup> The Metropolitan Transportation Commission (MTC)'s "Communities of Concern" definition helps to better map Bay Area frontline communities. A similar effort could perhaps be studied in the California Air Resources Board "Priority Populations" definition, which includes low-income communities and households are defined as the census tracts and households, respectively, that are either at or below 80 percent of the statewide median income, or at or below the threshold designated as low-income by the California Department of Housing and Community Development's (HCD) 2016 State Income Limits. Available at: <https://ww3.arb.ca.gov/cc/capandtrade/auctionproceeds/communityinvestments.htm>

state agencies to address equity, we should work to accurately map our frontline communities and recognize their existence accordingly.

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