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March 30, 2026

CalEnviroScreen
Office of Environmental Health Hazard Assessment
1001 I Street, Floor 12
Sacramento, CA 95814

Subject: San Mateo County Comments on the Draft CalEnviroScreen Version 5.0

To Whom It May Concern:

San Mateo County appreciates the opportunity to comment on the Draft CalEnviroScreen 5.0 (CES 5.0) and CalEPA's ongoing commitment to improving CES. The County recognizes the importance of updating indicators and datasets to reflect evolving science and community conditions.

Since CES plays a central role in identifying Disadvantaged Communities (DACs) and guiding state policy and investments, the County conducted a focused review of the draft CES 5.0 results in San Mateo County. Our analysis highlights several main concerns: (1) CES 5.0 may unintentionally underrepresent cumulative environmental justice conditions experienced by residents, including proximity to major traffic corridors, aging housing with lead risks, industrial land uses, and flood vulnerability; (2) changes in CES scores and DAC status often seem to be driven more by census tract boundary adjustments, indicator recalibrations, and data or modeling updates than by actual improvements in environmental exposure, health outcomes, or socioeconomic vulnerability; and (3) certain indicator shifts may reflect data limitations such as healthcare access bias and variability during the pandemic, which can skew comparisons over time. Consequently, communities with well-documented cumulative burdens, like those in San Bruno, East Palo Alto, North Fair Oaks, and San Mateo, might no longer be identified as disadvantaged, potentially reducing visibility and access to vital resources.

This letter summarizes these findings and offers recommendations to make CES 5.0 more accurately reflect on-the-ground conditions and promote equitable investment in communities most in need.

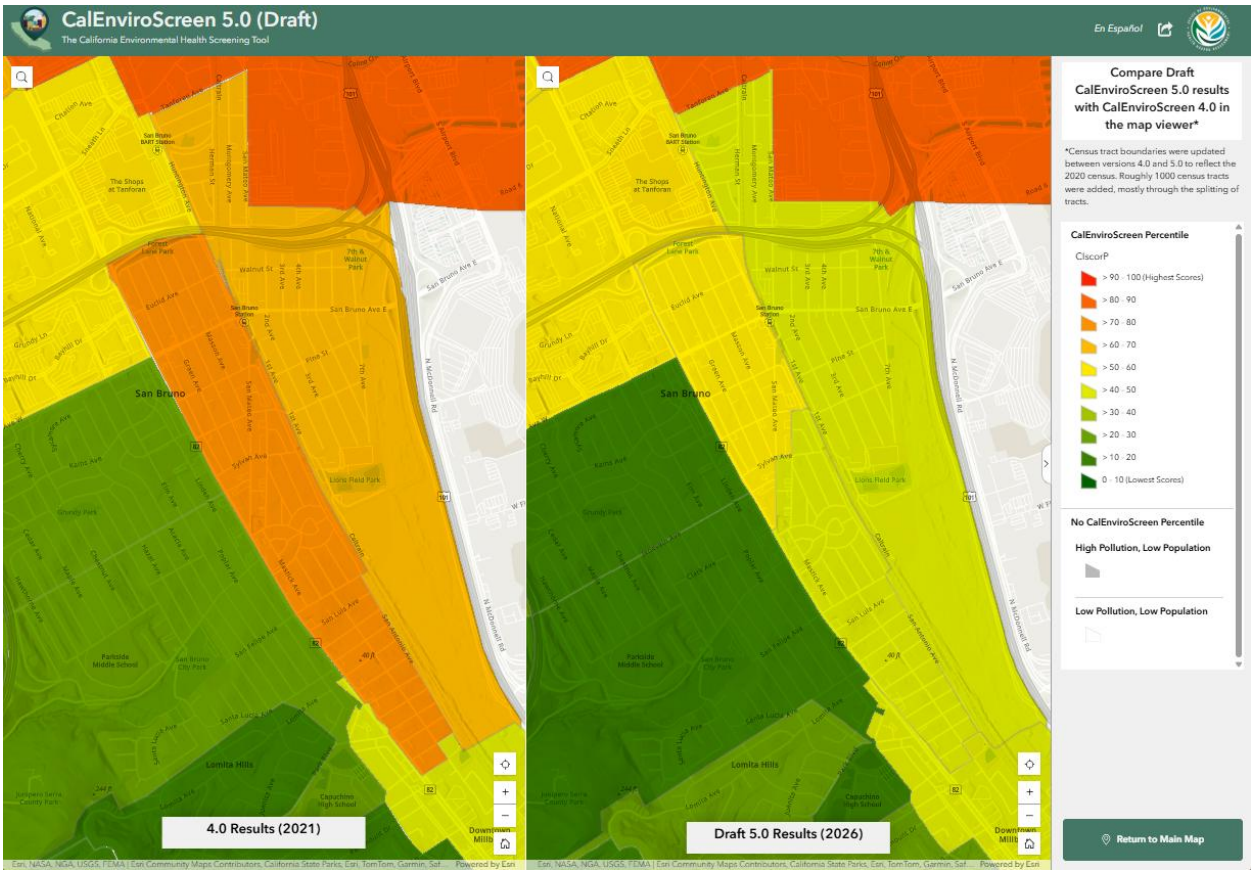
Evidence from San Mateo County Census Tracts

City of San Bruno: Census Tract 6081604101 → Census Tracts 6081604104 and 6081604103

In CES 4.0, this area is represented as Census Tract 6081604101; however, following census tract boundary changes, CES 5.0 reflects this area as two tracts: Census Tracts 6081604104 and 6081604103 (see Figure 1). Following the split of Census Tract 6081604101, the population across Census Tracts 6081604104 and 6081604103 remained nearly unchanged (8,053 in the 4.0 compared to a combined 7,889 in 5.0), yet both resulting tracts experienced declines in overall CES scores, pollution burden scores, and population characteristics scores, resulting in no longer qualifying as DACs in CES 5.0. Diesel particulate matter, groundwater threats, hazardous waste, and solid waste indicators all decreased across both tracts. These decreases do not correspond to a documented reduction in exposure, but rather reflect updates to underlying CES input data sources, including revised CES indicator datasets (e.g., CARB-modeled air pollution data, CalEPA facility inventories, and updated American Community Survey socioeconomic data) and the redistribution of environmental burdens across new tract boundaries. In practice, residents in these areas continue to live adjacent to major transportation corridors and industrial uses, where exposure to traffic-related air pollution and associated health risks remains a concern.

At the same time, the split reveals clear internal disparities that were previously averaged within the larger tract. Traffic impacts remain high in Census Tract 6081604104 but decrease significantly in Census Tract 6081604103, indicating concentrated exposure to major transportation corridors in the northern portion of the former tract. Health and socioeconomic indicators also diverge, with Census Tract 6081604103 showing higher low birthweight rates and increased housing burden, while Census Tract 6081604104 reflects comparatively lower vulnerability. Despite these persistent and differentiated conditions, neither tract qualifies as a DAC in CES 5.0, illustrating how tract subdivision can dilute cumulative impacts and obscure localized environmental justice conditions.

Figure 1 CalEnviroScreen Indicator Comparison – City of San Bruno (Census Tracts 6081604101 to 6081604104 and 6081604103)



City of San Mateo: Census Tract 6081606200 → Census Tracts 6081606201 and 6081606202

Census Tract 6081606200, previously identified as a DAC, was split into Census Tracts 6081606201 and 6081606202 although population totals remain nearly identical (see Figure 2). Census Tract 6081606201 retains many of the characteristics of the original tract, including a high concentration of older housing, low-income households with children, and elevated lead risk from housing, reflecting the continued presence of aging housing stock with potential lead-based paint hazards and vulnerable populations. However, it no longer qualifies as a DAC in CES 5.0.

This change is driven in part by updates to indicator methodologies and weighting. The lead risk from the housing indicator now incorporates blood lead level data, altering how risk is calculated across tracts. Environmental effects indicators, such as hazardous waste and solid waste, have also been reweighted

and redistributed. For example, the original tract scored in the 95th percentile for hazardous waste, while Census Tract 6081606201 now scores in the 56th percentile despite no clear evidence that site conditions have improved. Similarly, solid waste scores dropped significantly due to the reassignment of facilities to Census Tract 6081606202, even though proximity-based exposure conditions remain relevant to Census Tract 6081606201. Residents in this area remain in close proximity to these sites, and potential exposure pathways are not limited by tract boundaries.

As a result, the portion of the community experiencing the greatest vulnerability, Census Tract 6081606201, is no longer identified as a DAC, demonstrating how methodological changes and boundary changes can reduce composite scores without reflecting actual improvements in environmental or socioeconomic conditions.

Figure 2 CalEnviroScreen Indicator Comparison – City of San Mateo (Census Tracts 6081606200 to 6081606201 and 6081606202)

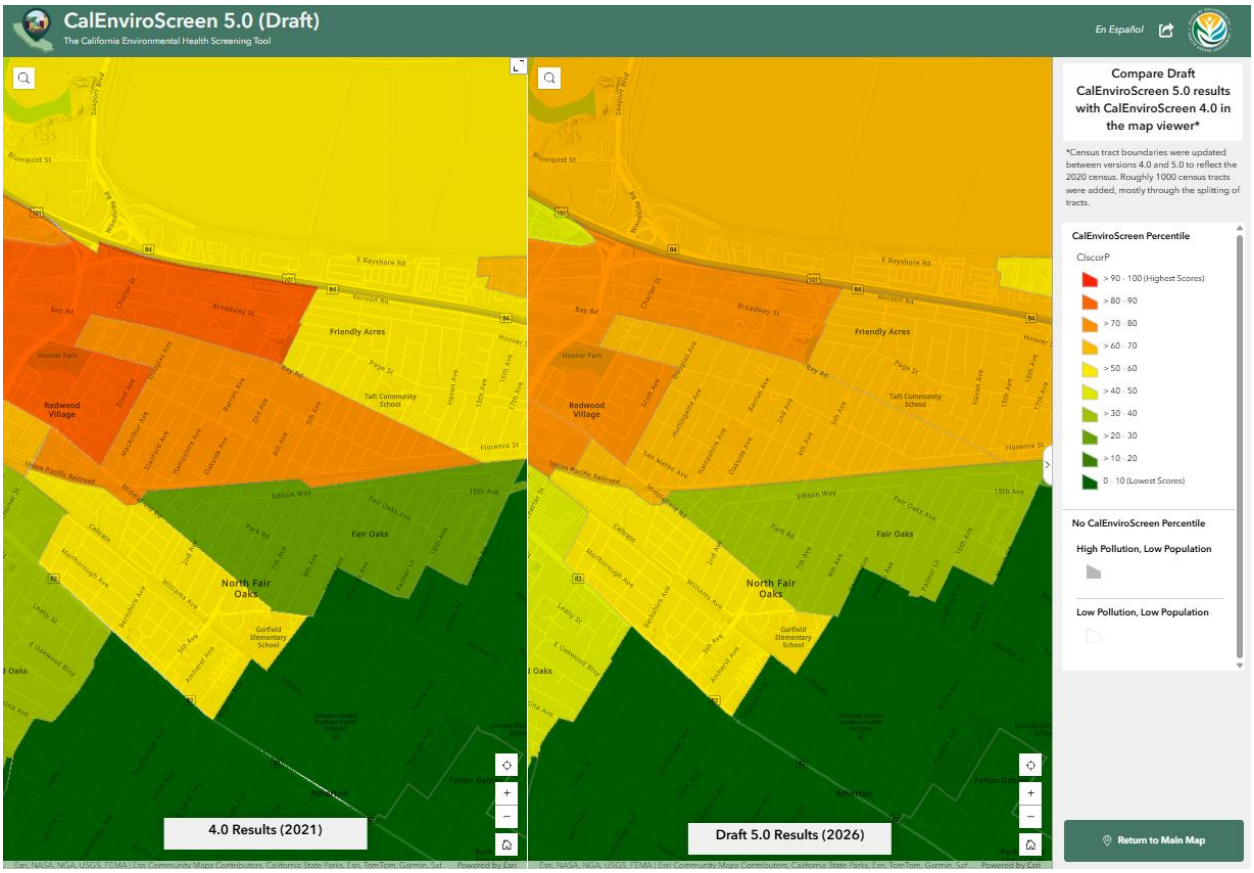
Unincorporated North Fair Oaks: Census Tract 6081610500

In North Fair Oaks, where census tract boundaries did not change, Census Tract 6081610500 (Figure 3) dropped below DAC thresholds due to approximately 10-point declines in both pollution burden and population characteristics scores. These changes are driven by shifts in individual indicators rather than documented improvements in conditions. This finding is consistent with the County's Environmental Justice Technical Appendix, which identifies North Fair Oaks as a High Priority Environmental Justice community based on persistent cumulative burdens, including older housing stock, proximity to industrial uses, and socioeconomic vulnerability.

Children's lead risk from housing decreased from the 93rd to the 82nd percentile, and diesel particulate matter dropped from the 64th to the 40th percentile. Environmental effects indicators also changed significantly, including a roughly 50 percentile point decrease in solid waste sites and facilities. While these shifts reflect updates to underlying CES input data and modeling assumptions, the specific drivers of these changes are not fully transparent and are difficult to attribute to any on-the-ground reduction in exposure. At the same time, socioeconomic conditions do not reflect comparable improvement. Unemployment increased from approximately 4 percent to 8 percent, and the community continues to experience longstanding environmental justice challenges associated with older and potentially substandard housing conditions, proximity to small-scale industrial and auto-related uses, and high renter occupancy, without clear evidence of corresponding on-the-ground improvements in environmental exposure or socioeconomic conditions.

This example demonstrates that even without boundary changes, updates to datasets and methodologies can result in the loss of DAC designation, suggesting that CES 5.0 outcomes may be more sensitive to technical adjustments than to actual changes in community conditions.

Figure 3 CalEnviroScreen Indicator Comparison – North Fair Oaks (Census Tract 6081610500)



City of East Palo Alto: Census Tract 6081612000 → Census Tracts 6081612001 and 6081612002

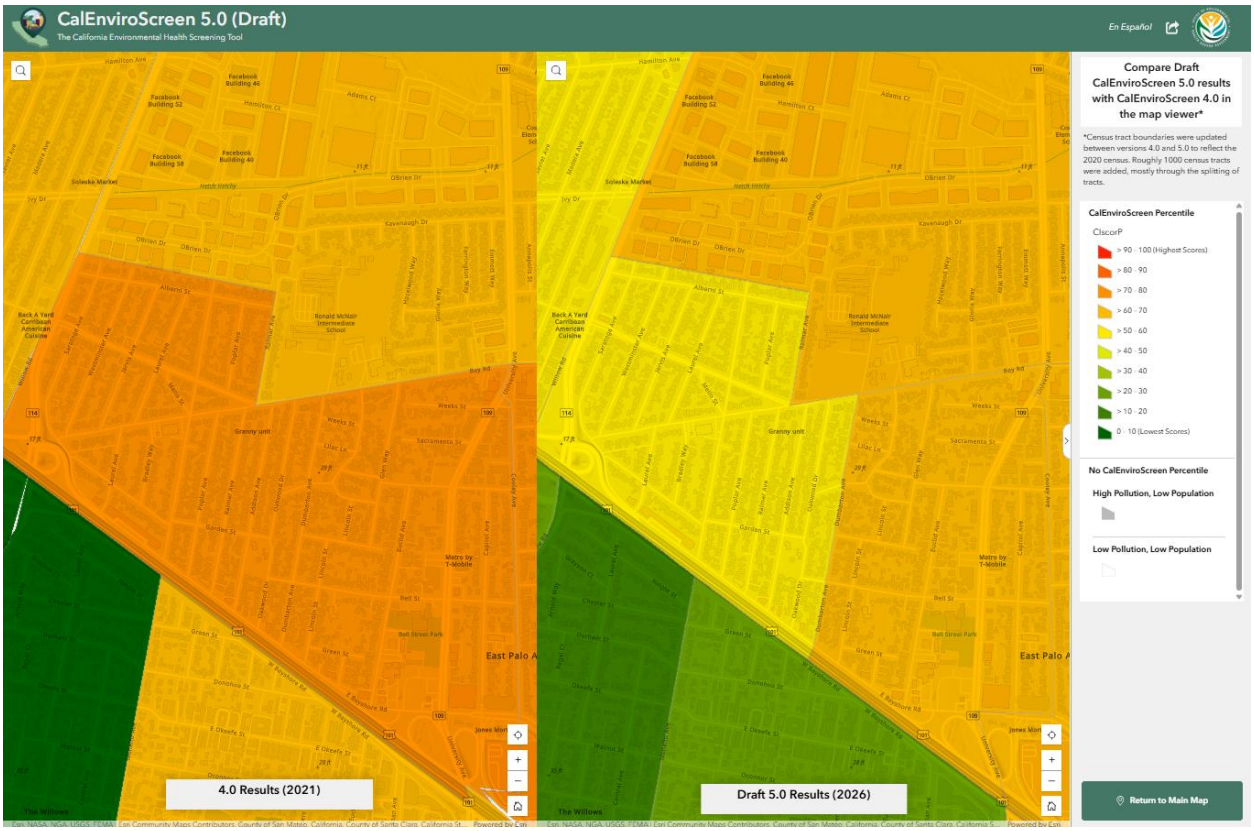
Census Tract 6081612000 in East Palo Alto appears to have been divided into two tracts in CES 5.0 (see Figure 4). The original tract captured high cumulative burdens associated with proximity to Highway 101, the Ravenswood industrial area, and bayfront uses. This area has long experienced overlapping

environmental and socioeconomic stressors, including exposure to industrial land uses, traffic-related air pollution, and flood risk due to its low-lying bayfront location, where residents face ongoing risk from flooding, groundwater rise, and proximity to legacy industrial contamination. Following the split, indicators such as diesel particulate matter, traffic, hazardous waste, and groundwater threats appear to be redistributed across the two new tracts.

As a result, each tract reflects only a portion of the original cumulative burden. One tract retains higher traffic and diesel particulate matter exposure due to proximity to major corridors, while the other reflects lower scores. Similarly, hazardous waste and cleanup site indicators decrease as facilities are reassigned or fall outside newly defined tract boundaries. This redistribution reflects how CES captures the location of individual indicators rather than the full extent of community exposure, particularly in areas where residents are affected by nearby or adjacent sources. Health and socioeconomic indicators also diverge between the two tracts, revealing disparities that were previously averaged within the larger geography.

Despite these persistent conditions, neither tract independently meets DAC thresholds, highlighting how tract subdivision can reduce composite scores and obscure cumulative impacts in a community with well-documented environmental justice concerns. This outcome is particularly notable in East Palo Alto, where environmental justice issues have been consistently identified through community-based planning efforts and prior analyses, suggesting that the change in designation reflects methodological sensitivity rather than a reduction in cumulative burden.

Figure 4 CalEnviroScreen Indicator Comparison – City of East Palo Alto (Census Tracts 6081612000 to 6081612001 and 6081612002)

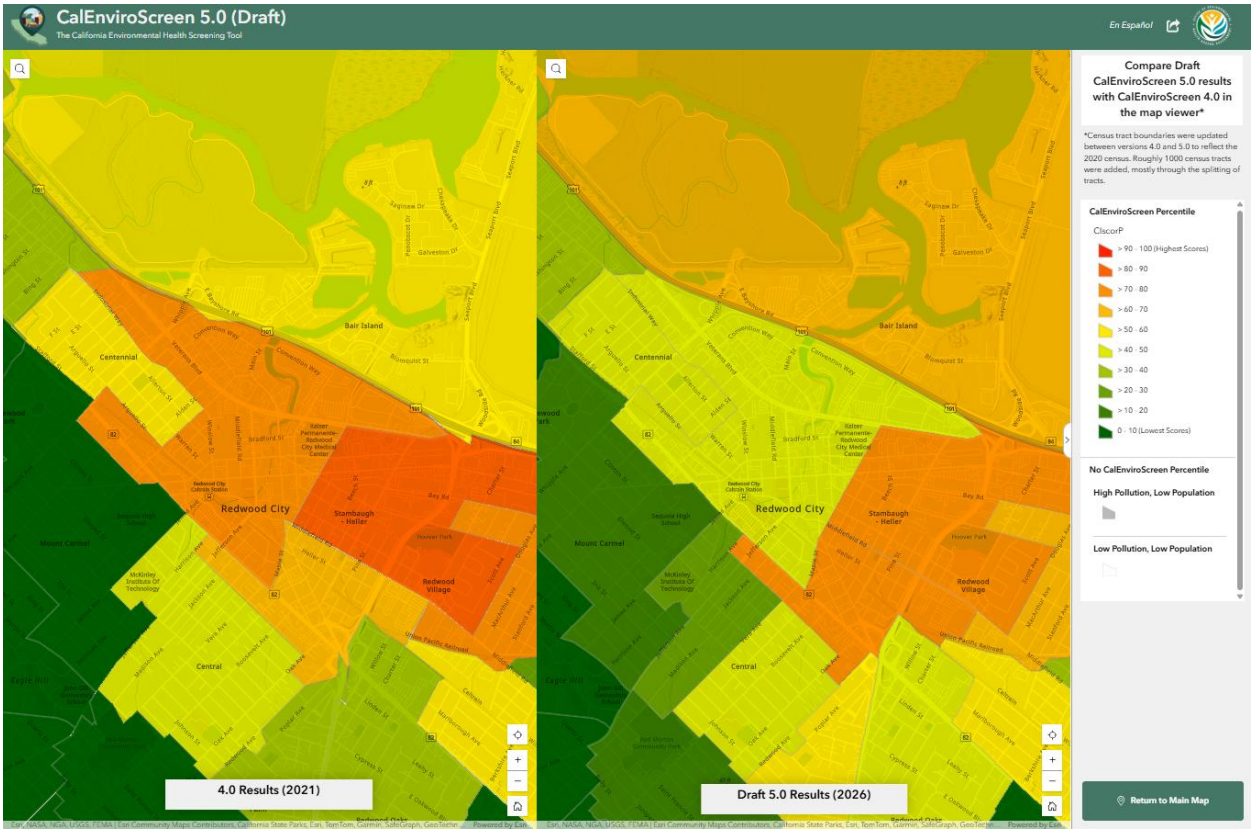


City of Redwood City: Census Tract 6081610202

Census Tract 6081610202 (Figure 5) experienced a substantial decrease in population characteristics score, dropping from the 71st percentile to the 34th percentile. This change is largely driven by a decline in housing burden from the 90th to the 21st percentile. However, this shift appears to be influenced by changes in underlying data rather than a meaningful reduction in housing cost pressures. The total number of households increased significantly, while the number of low-income households changed only marginally, resulting in a lower calculated burden. However, housing costs in this area remain high, and affordability challenges persist despite the observed change in indicator scoring.

Similarly, unemployment percentile scores dropped from the 42nd to the 7th percentile despite relatively stable poverty conditions, illustrating how ACS-based indicators can produce large percentile shifts due to sampling variability and changes in denominators. This example highlights the sensitivity of CES indicators to data inputs and the potential for substantial score changes without corresponding improvements in lived conditions.

Figure 5 CalEnviroScreen Indicator Comparison – City of Redwood City (Census Tract 6081610202)



Comparison to Local Vulnerability Assessment Tools

While CES 5.0 results suggest a reduction in cumulative burden across several of these tracts, alternative State screening tools do not reflect the same pattern. For example, LCI's Vulnerability Communities Platform and mapping tools identify areas such as Census Tract 6081606201 and portions of North Fair Oaks as having elevated social and climate vulnerability, including higher concentrations of renters, young

children, linguistically isolated households, and populations vulnerable to flooding and sea level rise. The divergence between CES 5.0 results and other State vulnerability frameworks further suggests that observed decreases in CES scores are not indicative of improved conditions, but rather reflect differences in methodology, indicator selection, and geographic scaling.

Data Considerations and Temporal Variability

Several of the observed shifts in socioeconomic and health indicators may also be influenced by the timing of underlying datasets, particularly those spanning the COVID-19 pandemic. The American Community Survey (ACS) and public health datasets used in CES 5.0 reflect multi-year periods that include significant economic and public health disruption beginning in 2020. During this period, unemployment, healthcare utilization patterns, and household composition changed substantially, often in ways that varied across communities. For example, emergency department visit rates declined during portions of the pandemic due to reduced access and avoidance of in-person care, which may artificially lower indicators such as asthma and cardiovascular disease in CES (Centers for Disease Control and Prevention [CDC] 2020). Similarly, fluctuations in employment and income during this period may contribute to volatility in unemployment and poverty indicators (Antipova 2021; Piacentini et al. 2022; U.S. Bureau of Labor Statistics 2021; U.S. Census Bureau 2021). These dynamics further complicate interpretation of changes between CES 4.0 and CES 5.0 and reinforce that observed score reductions should not be interpreted as clear improvements in underlying conditions.

Methodological and Data Limitations

Beyond tract-level observations, the County has identified several limitations in CES 5.0 that affect its ability to accurately capture environmental justice conditions. Air quality indicators such as PM2.5 and ozone are derived from a limited monitoring network; San Mateo County has only one monitor located in Redwood City, which constrains the spatial resolution of these indicators across the County. In addition, the diesel particulate matter indicator appears to rely on relatively recent emissions modeling that may reflect pandemic-era or post-pandemic travel patterns. Traffic volumes in 2020–2023 were atypical compared to pre-pandemic conditions, with sustained reductions in commuting and changes in travel behavior due to remote work and public health restrictions (U.S. Bureau of Transportation Statistics, 2023). As a result, diesel particulate matter estimates in CES 5.0 may underrepresent typical long-term exposure conditions in high-traffic corridors, particularly in areas adjacent to major transportation infrastructure such as Highway 101.

Health indicators rely on a limited set of outcomes and, in the case of asthma and cardiovascular disease, are based on emergency department visit rates. This methodology introduces bias related to healthcare access, as communities with limited insurance coverage or barriers to care may underutilize emergency services despite experiencing adverse health outcomes (Kang et al. 2021; CDC 2020). As a result, CES may understate health burdens in the very populations it is intended to identify. Additionally, differences in how health outcomes are measured across datasets introduce potential inconsistencies in indicator comparability.

The poverty indicator, which measures the population living below half the federal poverty level, may not fully capture economic hardship in high-cost regions such as the Bay Area. In San Mateo County, local analyses often consider thresholds at or above 200 to 400 percent of the federal poverty level to better capture financial strain. As currently defined, the CES poverty metric may not capture a substantial portion of households experiencing economic vulnerability in high-cost regions such as San Mateo County.

Finally, CES remains focused primarily on pollution-related indicators and does not capture other critical hazards affecting San Mateo County, including sea level rise, wildfire smoke, and extreme heat. These

hazards are not separate from pollution burden but can directly exacerbate existing environmental risks. For example, climate change poses a serious risk to shoreline contaminated sites due to projected sea level rise and groundwater rise, which can mobilize and spread buried contaminants into the environment and increase exposure pathways that negatively impact human health. In coastal areas such as San Mateo County, rising groundwater can also bring contaminants to the surface or into contact with infrastructure, creating new or expanded exposure risks that are not reflected in current CES indicators. These hazards represent significant and growing risks in the County and are not reflected in CES scoring, limiting the tool's ability to capture cumulative climate-related vulnerability and the ways in which climate stressors may intensify existing pollution burdens over time.

From an implementation perspective, these limitations also create challenges in aligning CES with local planning and public health frameworks. While community-based organizations frequently rely on CES, local agencies often supplement or rely on alternative tools (e.g., Healthy Places Index or locally developed vulnerability maps), which can create inconsistencies in how environmental justice conditions are communicated and addressed.

Conclusion

Based on the County's analysis, CES 5.0 may unintentionally underrepresent environmental justice conditions in San Mateo County and similar high-cost, urbanized regions. In these examples, residents still face real-world conditions such as proximity to traffic corridors, aging housing with lead risks, industrial land uses, and flood vulnerability that are not reflected in the observed changes in CES scores. Changes in DAC designation seem to be driven mainly by census tract boundary changes (redistricting), indicator recalibration, and data updates rather than by meaningful improvements in environmental or socioeconomic conditions. Although incorporating new and updated data is important for CES, the County's analysis shows that, in several cases, these updates mainly reflect changes in data inputs, modeling assumptions, or geographic allocation of indicators, rather than actual on-the-ground improvements in exposure or vulnerability. In many cases, communities with well-documented cumulative burdens, such as those in San Bruno, East Palo Alto, North Fair Oaks, and San Mateo, are no longer classified as disadvantaged despite ongoing exposure to environmental hazards and persistent social vulnerability.

Additionally, several indicator shifts seem to be affected by underlying data limitations, such as healthcare access biases and pandemic-era data variability, further emphasizing that changes in CES scores do not necessarily indicate improvements in community health or socioeconomic conditions.

Given CalEnviroScreen's key role in directing state investments and policies, these results carry important consequences. Removing communities from DAC status could restrict their access to vital funding and resources and might diminish awareness of communities still facing significant environmental and health challenges. As it stands, CES 5.0 might lessen the emphasis on cumulative impacts and hide specific local disparities, especially in regions where changes in tract boundaries and indicator sensitivity lower composite scores below the threshold.
San Mateo County respectfully urges CalEPA to further evaluate the implications of CES 5.0 before finalizing it. This includes examining how tract boundary changes and indicator methodologies affect DAC designation. More consideration should be given to ensure communities with ongoing environmental justice issues are not excluded due to technical or methodological artifacts.

We appreciate the State's ongoing efforts to improve CalEnviroScreen and look forward to working together in refining the tool so it better reflects local conditions and promotes fair investments in communities most in need. If you have any questions, please contact Connie Juarez-Diroll, Chief Legislative Officer, at 650-599-1341 or email cjuarez-diroll@smcgov.org.

Sincerely,

Noelia Corzo, President
San Mateo County Board of Supervisors

CC: San Mateo County Board of Supervisors
San Mateo County Executive

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