



March 30, 2026

Secretary Yana Garcia
California Environmental Protection Agency
Office of Environmental Health Hazard Assessment
1001 I St.
P.O. Box 2815
Sacramento, CA 95812

Re: Draft CalEnviroScreen 5.0

Dear Secretary Garcia,

Thank you for the opportunity to comment on the draft CalEnviroScreen 5.0 data set. We recently learned of the opportunity to provide comments and have done our best with limited time to review the proposed changes. **We ask that CalEPA delay the finalization of the CalEnviroScreen 5.0 to allow for more input and to better understand how the tool can be improved so that communities in need of investment, such as the Canal in San Rafael, are not left out.**

Additionally, we see an opportunity to more fully capture the hazards many communities face as a result of climate change. We kindly ask you to consider additional data sets for the following areas as a way to strengthen this important tool.

We request that the impacts of flooding be added to how pollution burden and water impacts are assessed. Flooding is already impacting vulnerable communities, including San Rafael, but these impacts are not reflected in the current or proposed CalEnviroScreen maps. Chronic flooding and high groundwater levels have the potential to increase chronic exposure to both waterborne pollutants as well as create on-going mold and mildew concerns in exposed housing. Repeatedly our residents have voiced these concerns as affecting their community currently. This is especially concerning in the Canal District of San Rafael (Census Tract 6041112201 in 4.0 and 6041112203 and 6041112204 in 5.0), one of San Rafael's most diverse and densely populated areas with Latinos representing 88% of the neighborhood's residents and the highest population density in the Bay Area outside of downtown San Francisco. These exposures will worsen as the ground continues to subside, sea levels rise, and storms intensify.

We request that risk of exposure to natural hazards be added to the CalEnviroScreen data sets. Tools like the Office of Climate and Land Use Innovation’s existing Vulnerable Communities Platform (vcp.lci.ca.gov) already captures the linkages between climate hazard risks and the disproportionate impacts on systemically vulnerable communities. Local data sets in Marin also show this connection, specifically Marin County’s Climate and Health maps (www.marinhhs.org/marin-county-climate-and-health). The integration of climate hazard data, such as from these two tools, would strengthen the ability of the CalEnviroScreen to more fully capture the impacts of climate change on communities currently facing a disproportionate environmental burden.

We request that additional housing indicators be added to the assessment, such as overcrowding, risk of displacement, and habitability. While housing cost burden is an important data point, the complex housing issues facing communities are not one-dimensional. For example, according to HUD CHAS data, Housing Burden in the Canal Census Tract 604112203 shifted from the 99th to the 68th percentile, however tenants are shouldering additional fees as landlords increasingly charge separately for utilities including refuse, the share of overcrowded households in the Canal has increased, habitability issues persist, and risk of displacement is high. In addition to housing cost burden, we recommend the addition of data sets on:

- Overcrowding, as used in the CDC’s Social Vulnerability Index (svi.cdc.gov) and the Healthy Places Index (www.healthyplacesindex.org). A decrease in housing burden could reflect households doubling or tripling up to make ends meet.
- Risk of displacement, as mapped by the Urban Displacement Project (urbandisplacement.org/maps/sf-bay-area-gentrification-and-displacement/). A decrease in housing burden could reflect lower income residents being priced out of the neighborhood and replaced by higher income residents, suggesting increased displacement pressure on the remaining low-income residents.
- Habitability, as used in the Healthy Places Index (www.healthyplacesindex.org). Housing costs may be lower because of poor housing conditions and persistent habitability issues.

Finally, we are curious how the updated CalEnviroScreen 5.0 data sets are generated because they currently tell a story of overall improvement in Canal District of San Rafael (Census Tract 604112201) when the lived experience doesn’t match the data. With increased flooding and continued housing pressures, indicators like the below don’t appear to match what is happening in our community:

- What changed that resulted in a lower percentile for Impaired Waters in the Canal, from 87 to 80?
- What changed that resulted in a lower percentile for Overall Population Characteristics in the Canal, from 74 to 54 and 68 respectively? Especially noting the change from 33 to 51 and 61 percentiles for rates of low-birth-weight infants?

We look forward to clarification on how these updates resulted in the changes we are seeing and appreciate the opportunity to flag our areas of concern and recommendations to strengthen this tool.

Sincerely,

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