



April 1, 2026

Secretary Yana Garcia

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

Re: Draft CalEnviroScreen 5.0

Dear Secretary Yana Garcia,

Our coalition represents 30 community-based organizations that serve and represent environmental justice communities. For decades, our organizations have worked on 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 10,000 low-income and at-risk youth, over 15,000 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 shaped more than \$12.8 billion in Cap-and-Invest funding for 117 programs within 27 state agencies.¹ Due to its repeated use in state legislation and regulations, this mapping tool and definition have evolved from their original intended use of equitably targeting *climate*-related funding to becoming the de facto state definition applied to many equity-oriented policies and programs. This intensifies challenges for communities who rank among the highest in the state on a number of issues, yet do not make the top 25% percentile threshold in CES to be designated a “disadvantaged community” by the California Environmental Protection Agency (CalEPA).

Unfortunately, the newly proposed Draft CES 5.0 worsens inequality and access to state resources for San Francisco’s communities of need. For instance, most of South of Market (SoMa) falls out of the state’s “Disadvantaged Communities” (DACs) definition in Draft CES 5.0. While Tenderloin gains census tracts, the Mission District and most of Chinatown still do not qualify as DACs despite increased need, notable both on-the-ground and through the indicators scored by CES itself. Even Bayview-Hunters Point loses census tracts under the new version of CES. Now more than ever, it remains essential to map the need in neighborhoods and immigrant communities besieged by climate change, food insecurity, and scarce resources.

I. South of Market is mostly excluded under Draft CES 5.0.

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. The region also faces severe environmental and socioeconomic threats including the concentration of many Single-Room Occupancy (SRO) buildings. SROs are small units (typically 8 x 10 feet in size) with shared kitchen and bathroom facilities, often overcrowded with large families. These buildings are seen as essential housing for San Francisco’s low-income populations, highlighting the region’s unique needs and vulnerabilities.

Despite these issues, Draft CES 5.0 disqualifies both of SoMa’s census tracts that were previously in the top quartile under CES 3.0, while placing one of its other census tracts at a score that barely exceeds the 75th percentile.^{3,4}

II. Nearly all of Chinatown remains unrecognized under Draft CES 5.0.

Multiple iterations of CalEnviroScreen have revealed the various socioeconomic and environmental challenges of Chinatown, yet only **one out of six** census tracts made the DAC designation threshold in Draft CES 5.0.² Given visibility around anti-Asian violence throughout March 2021, the Governor visited San

¹ *California Climate Investments: 2025 Annual Report Factsheet*. California Air Resources Board, 2025.

https://ww2.arb.ca.gov/sites/default/files/auction-proceeds/cci_2025ar_factsheet.pdf.

² Under CES 3.0, only two of the twelve census tracts in the Tenderloin were classified as Disadvantaged Communities. But under Draft CES 4.0, not a single census tract scored 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.

Newly added indicators of diabetes and small air toxic sites reflect sensitivity to pollution exposures and exposure burdens from oil and natural gas wells, respectively, with both placing Chinatown in the upper quartile. Specifically regarding the prevalence of adult diabetes, Chinatown holds the highest percentile out of the disadvantaged communities of our note. [Draft CalEnviroScreen 5.0 Report](#), p.26

Francisco Chinatown on March 19, 2021 to discuss increased resources for Asian-Pacific Islander communities and specifically recognized the shortcomings of CalEnviroScreen.³

III. All of the Mission District is missing under Draft CES 5.0.

In the Mission District, needs are highly varied across its 17 census tracts, but unifying threats place it in top rankings for asthma, drinking water, groundwater, and lead from housing.⁴ In addition, state rankings have increased under Draft CES 5.0 for various categories including drinking water contaminants, cleanup sites, unemployment, low birth weight, toxic releases, and PM2.5 exposure. Socioeconomic and environmental threats are worsening in the Mission District, yet not a single census tract qualifies as a Disadvantaged Community.⁵

IV. The Tenderloin gains 7 census tracts under Draft CES 5.0, yet still misses 4 census tracts.

In Draft CES 5.0, Tenderloin now has 8 census tracts identified in the top 25%, a significant increase from just 2 census tracts in CES 3.0 and zero in 4.0. While this gain is a significant win for these 8 tracts, **4 tracts in the Tenderloin remain below the threshold to be considered DACs.** With a dense population of 46,000 people per square mile and soaring rates of poverty during the pandemic,⁶ the Tenderloin has long struggled with environmental and socioeconomic burdens that are not adequately captured by previous versions of CES, including the concentration of SRO buildings.²

V. Draft CES 5.0 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.

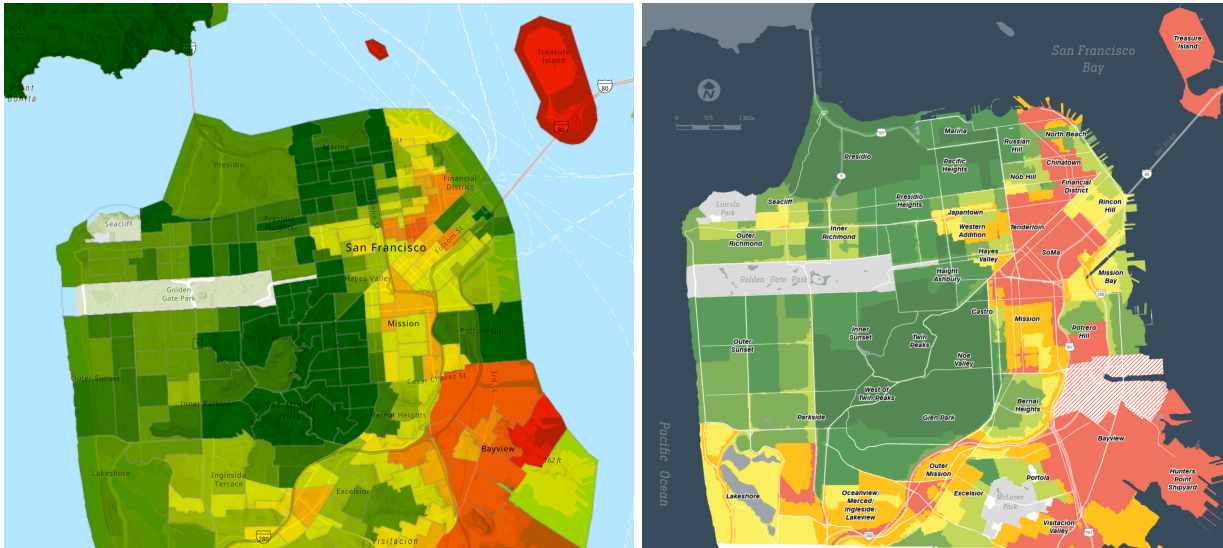
While utilizing CES data, San Francisco's draft EJ Communities Map also utilizes local data on pollution and demographics while drawing on community feedback to include more neighborhoods, such as Western Addition and Potrero Hill.⁵ The maps on the next page demonstrate the large gap:

³ ABC 7 News, "What the hell is wrong with us?" Newsom condemns anti-Asian racism in San Francisco," March 19, 2021, <https://abc7news.com/post/governor-newsom-asian-pacific-islander-california-covid-crime/10432836/>

⁴ OEHHA, "Draft CalEnviroScreen 5.0," OEHHA, January 14, 2026, <https://oehha.ca.gov/calenviroscreen/report/draft-calenviroscreen-50>.

⁵ California Office of Environmental Health Hazard Assessment, "CalEnviroScreen 4.0," CA.gov, March 1, 2021, <https://oehha.ca.gov/calenviroscreen/report/calenviroscreen-40>;

⁶ Cook, Christopher D. "What Crowding Looks Like During a Pandemic: Dismal Days in the Tenderloin." San Francisco Public Press, August 28, 2020. <https://www.sfpublishpress.org/what-crowding-looks-like-during-a-pandemic-dismal-days-in-the-tenderloin/>.



Sources: These maps show the extreme differences between Draft CalEnviroScreen 5.0 Map (left) and the EJ Communities Map by the SF Planning Department (right)⁷

In 2025, the Metropolitan Transportation Commission (MTC) proposed an updated definition to its “Equity Priority Communities” definition (previously known as its “Communities of Concern” identified for investment) 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.⁸

Recommendations for the California Environmental Protection Agency (CalEPA) and California Office of Environmental Health Hazard Assessment (OEHHA):

1. Move away from a single composite score to enable targeted funding.

CES’s reliance on a single cumulative score often fails to match specific community needs with available resources. Research from Johns Hopkins, Cornell, and Stanford confirms that CES scores are highly sensitive to small model assumptions and minor technical adjustments. Because CES relies on an “all-or-nothing” score, every minor adjustment can lead communities to lose eligibility regardless of whether on-the-ground conditions change or not.⁹

To address this, CalEPA should move away from using a single composite score, and instead adopt a programmatic approach where eligibility is tied to specific indicators relevant to the grant’s purpose. For example, air quality investments should be directed to neighborhoods in the highest percentiles for air-burden indicators, and housing resources should reach those facing highest housing burdens, regardless of whether their statewide rank meets the 75th percentile cutoff.

⁷ *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>

⁸ Equity Priority Communities, Metropolitan Transportation Commission (February 6, 2025), <https://mtc.ca.gov/planning/transportation/access-equity-mobility/equity-priority-communities>

⁹ Huynh, Benjamin Q., Elizabeth T. Chin, Allison Koenecke, et al. “Mitigating Allocative Tradeoffs and Harms in an Environmental Justice Data Tool.” *Nature Machine Intelligence* 6, no. 2 (2024): 187–94. <https://doi.org/10.1038/s42256-024-00793-y>.

2. Integrate localized data that accounts for specific regional issues.

CES currently operates under a self-imposed constraint of only using data that is available uniformly across the entire state. This approach systematically ignores severe environmental and public health issues concentrated in particular regions. By only using what's measurable for every census tract, the tool misses unique, localized burdens prevalent in the Bay Area—such as the urban pesticide exposure, indoor mold in aging housing stock, temporal housing trends and gentrification, and the high rates of houselessness and housing insecurity.

OEHHA should work with regional experts to incorporate localized and regional data on these particular burdens. For example, collecting regional data on indoor mold issues in SRO housing could better capture the unique harms faced by underhoused residents. Additionally, using point-in-time count data attributed to the county as a new population characteristic could help capture vulnerabilities of both underhoused and unhoused populations. We also recommend incorporating data on customer bill delinquencies and other cost metrics to substantiate scoring on socioeconomic factors. Integrating this localized information would help “ground truth” the tool to reflect the real conditions our communities are facing.

3. Refine indicators and weighting to adequately reflect Bay Area communities.

While structural changes to the model are most critical (recommendations 1 and 2), some reforms to the indicators and weighting system can also bring marginal improvements. For example, OEHHA should weigh pollution burden in urban centers higher to account for the current bias against urban pollution due to the smaller census tracts, modify the pesticides indicator to include data on urban pesticide exposures, and refine the PM 2.5 indicator to better capture the intensity of traffic-related air pollution. We urge OEHHA to make these reforms quickly, while also exploring other weighting and indicator adjustments that can better capture environmental justice communities in need.

4. Broaden CalEPA’s DAC Designation

In addition to OEHHA working to resolve the systemic biases within the CES model itself, CalEPA should exercise its administrative discretion to broaden the formal DAC designation. We urge the Secretary to look beyond the top 25th percentile composite score and include census tracts that rank in the highest percentiles for specific, high-impact categories such as the Population Characteristics or Environmental Effects scales. This approach is rooted in CalEPA’s own 2022 DAC designation framework which already includes federally recognized Tribal Lands and census tracts scoring in the highest 5% of Pollution Burden.¹⁰ CalEPA should expand this to include communities on the edge in the Bay Area—including those in Bayview-Hunters Point, Chinatown, the Mission District, SoMa, and the Tenderloin—in addition to all census tracts that have been classified as DACs in prior iterations of CES.

In summary, we call upon the CalEPA and OEHHA to improve Draft CES 5.0 to reflect the extraordinary need in our communities, including but not limited to Chinatown, Mission District, South of Market, Bayview-Hunters Point, and the Tenderloin. In order for California to champion equity, it must acknowledge all the communities on the frontlines of environmental pollution and harm.

¹⁰ California Environmental Protection Agency, The Revised Designation of Disadvantaged Communities Pursuant to Senate Bill 535 (Sacramento, CA: CalEPA, May 2022), https://calepa.ca.gov/wp-content/uploads/2022/05/Updated-Disadvantaged-Communities-Designation-DAC-May-2022-Eng.a.hp_-1.pdf.

Eddie Ahn, Executive Director
Brightline Defense

Sarah Wan, Executive Director
Community Youth Center

Malcolm Yeung, Executive Director
Chinatown Community Development Center

Jennifer Dolin, CEO
Tenderloin Neighborhood Development Corp.

Anni Chung, President and CEO
Self-Help for the Elderly

Luisa Antonio, Executive Director
Bayanihan Equity Center

Allan Low, Attorney
Committee for Better Parks and Recreation in
Chinatown

Jon Hee, Chair
Chinatown TRIP

Cally Wong, Director
API Council

Avni Jamdar, Director
Emerald Cities, SF Bay Area

Juan Garcia, Coalition Manager
SRO Families United Collaborative

Jacqueline Bryant, Executive Director
A. Philip Randolph Institute-SF

Michelle Leonard-Bell, Director
Mission Hiring Hall

Pratibha Tekkey, Organizing Director
Central City SRO Collaborative
La Voz Latina, Tenderloin Housing Clinic

Kent Woo, Executive Director
NICOS Chinese Health Coalition

Jerry Yang, Ph.D. Executive Director
Kai Ming Head Start
Substitute Teacher Empowerment and Placement

Orchid Pusey, Executive Director
Asian Women's Shelter

Jenny Leung, Executive Director
Chinese Culture Center of San Francisco

Arieann Harrison, Founder/CEO
Marie Harrison Community Foundation, Inc.

Joanne Lee, Executive Director
Chinatown Media & Arts Collaborative

James Richards, President
ABU - Aboriginal Blackman United

Gwendolyn Jackson Fagan & Dr. DeTrice Rodgers,
Co-Chairs
Dr. Espanola Jackson (EJ) Social Justice
Collaborative

Rick Cantora, Executive Director
Bill Sorro Housing Program (BiSHoP)

Sam Moss, Executive Director
Mission Housing Development Corp

Luis Granados, Chief Executive Officer
Mission Economic Development Agency (MEDA)

Angelica Cabande, Executive Director, (SOMCAN)
South of Market Community Action Network

David Woo, Community Development and Policy
Coordinator
SOMA Pilipinas Cultural Heritage District