

March 27, 2026

*Subject: Public Comment Letter on Draft CalEnviroScreen 5.0*

To The Office of Environmental Health Hazard Assessment,

The Peninsula Accountability for Contamination Team (PACT) is writing to provide comments on the Draft CalEnviroScreen 5.0 (Draft CES 5.0). **PACT's mission is to advocate alongside community members to advance contaminated site clean-up and infrastructure resilience, addressing the impacts of sea level and groundwater rise in low-lying areas of the Peninsula and beyond. Through this work, we aim to safeguard the health and well-being of our community for generations to come.** We appreciate the opportunity to participate in the public comment process. PACT member organizations include Climate Resilient Communities, Nuestra Casa, Youth United for Community Action, Belle Haven Empowered, Belle Haven Community Development Fund, and El Concilio of San Mateo County. Amid a nearly \$3 billion state budget deficit and dwindling federal funding support, a tool like CES 5.0 is even more critical for prioritizing funding for environmental justice communities statewide. To this end, PACT would like to share some of our concerns regarding the Draft CES 5.0 tool.

Sites of concern, where the census tract's percentile dropped below 75 in the Draft CES 5.0:

- **East Palo Alto Shoreline, 6081611900.** The Draft CES 5.0 score for the census tract covering a large portion of the East Palo Alto shoreline went from 75 (CES 4.0) to 65.23 (Draft CES 5.0).
- **East Palo Alto, 6081612000.** This census tract split into two tracts: 6081611901 and 6081612002, and the Draft CES 5.0 score for the census tracts went from 77 (CES 4.0) to 63.19 and 64.59, respectively (Draft CES 5.0).
- **North Fair Oaks, 6081610500.** The Draft CES 5.0 score for the census tract went from 75 (CES 4.0) to 65.73 (Draft CES 5.0).
- **Redwood City, 6081610202.** The Draft CES 5.0 score for the census tract covering a large portion of the East Palo Alto shoreline went from 76 (CES 4.0) to 46.9 (Draft CES 5.0).

### **Scoring Characteristics of Disadvantaged Communities**

CalEnviroScreen's scoring framework remains central to how the state defines disadvantage, yet questions remain about whether a single composite score adequately captures cumulative burden. We encourage OEHHA to explore complementary or alternative approaches, such as:

- Strengthening how the tool incorporates historical land uses and legacy pollution burdens, including alignment with approaches used by the U.S. Environmental Protection Agency and regional water quality agencies. Communities affected by past industrial activity, brownfields, and shoreline contamination may not be fully captured through current indicators. In particular, we are concerned about the pattern of lower overall CalEnviroScreen percentile scores in shoreline census tracts that contain contaminated sites (see sites of concern above). This suggests that cumulative risk in these areas—especially in parts of the Bay Area—may be underestimated.

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- Explicitly address how neighborhood change and displacement may affect scores over time. Reliance on current income and demographic data may obscure the legacy of disadvantage in rapidly gentrifying areas. Potential approaches could include:
  - Incorporating longitudinal or historical indicators
  - Using supplemental income or housing burden metrics
  - Exploring methods to recognize “previously disadvantaged communities” that remain environmentally burdened despite demographic shifts. For example, the census tract in East Palo Alto referenced above had an increasing pollution burden but reduced population characteristics— indicating that it was displacement and not improved environmental conditions that reduced the overall score.
- Potential recalibration of indicator weights (e.g., lead exposure, traffic pollution, groundwater contamination), where current weighting may underrepresent localized risks.

### **Outreach and Engagement**

We commend OEHHA for conducting outreach through eight statewide nonprofit organizations. However, we encourage further clarification on how engagement reached communities that do not primarily speak English, including whether materials, workshops, and feedback opportunities were meaningfully accessible in multiple languages and culturally appropriate formats. Expanding direct, community-based engagement—beyond intermediary organizations—will strengthen the tool’s legitimacy and usability.

Thank you again for your leadership and for considering these comments. We look forward to continued engagement as CalEnviroScreen 5.0 is finalized.

Sincerely,

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Violet Wulf-Saena, Founder and Executive Director of Climate Resilient Communities

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