

April 1, 2026

**Submitted by the San Francisco Bay Shoreline Contamination Cleanup Coalition**

**Draft CalEnviroScreen 5.0 – Public Comment**

Comments to the (*hereafter referenced as “draft CES 5.0”*)

**To the Office of Environmental Health Hazard Assessment:**

The San Francisco Bay Shoreline Contamination Cleanup Coalition submits these comments on behalf of its member organizations:

1. 350 SF
2. All Things Bayview
3. Bayview Hunters Point Mothers & Fathers Committee
4. Breathe
5. Citizens for East Shore Parks (CESP)
6. Climate Reality Project Bay Area Chapter
7. Climate Resilient Communities
8. Greenaction for Health & Environmental Justice
9. Marie Harrison Community Foundation
10. Marin City Climate Resilience & Health Justice
11. Our City SF
12. Point Molate Alliance
13. Richmond Shoreline Alliance
14. Rise South City
15. SF Baykeeper
16. Sunflower Alliance
17. West Oakland Environmental Indicators Project
18. XRSF
19. Youth Vs Apocalypse

The San Francisco Bay Shoreline Contamination Cleanup Coalition mobilizes for the safe, comprehensive, and immediate cleanup of all toxic and radioactive contamination near the San Francisco Bay shoreline, where Sea Level Rise (SLR) and groundwater rise (GWR) due to the climate crisis will mobilize and spread the contamination. Environmental and climate justice is our highest priority.

**Comment 1: Consistent Lower Overall CalEnviroScreen Percentile Scores Along Contaminated Shoreline Sites of Community Concern**

The Draft CES 5.0 map does not account for climate change indicators, climate impacts, or the built environment and OEHHHA has reported that these, among other factors, may be considered for “CalEnviroScreen 6.0 and Beyond”. CalEnviroScreen can be a critical tool for environmental justice organizing and helps showcase cumulative impacts on a census tract scale. The Climate Crisis poses a serious risk to shoreline contaminated sites due to projected sea level rise and groundwater rise that can mobilize and spread buried contaminants into the environment and increase dangerous exposure pathways negatively impacting human health.

**Specific sites of concern include:**

**Hunters Point Naval Shipyard, Census tract: 6075980600**

The Overall Draft CES 5.0 percentile score for the census tract covering the Hunters Point Naval Shipyard *Superfund Site* went from 83 (CES 4.0) to 42.96 (Draft CES 5.0). Superfund Sites are the most contaminated sites in the United States.

**Richmond Shoreline, Census tract: 6013378000**

The Overall Draft CES 5.0 percentile score for the census tract covering a large portion of the Richmond shoreline went from 71 (CES 4.0) to 57.14 (Draft CES 5.0).

**Richmond Shoreline including Zeneca Site, Census tract: 6013380001**

The Overall Draft CES 5.0 percentile score for the census tract covering a large portion of the Richmond shoreline went from 75 (CES 4.0) to 37.52 (Draft CES 5.0).

**Oakland Shoreline, 6001428700**

The Overall Draft CES 5.0 percentile score for the census tract covering a portion of the Oakland shoreline went from 77 (CES 4.0) to 53.22 (Draft CES 5.0).

**Oakland Shoreline, 6001401700**

The Overall Draft CES 5.0 percentile score for the census tract covering a portion of the Oakland shoreline went from 80 (CES 4.0) to 54.4 (Draft CES 5.0).

### **East Palo Alto Shoreline, 6081611900**

The Overall Draft CES 5.0 percentile 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).

We are concerned about the pattern of lower scores for the Overall CalEnviroScreen percentile scores for census tracts on the shoreline that contain contaminated sites. Many of our groups work directly in these shoreline communities and rely on this data to provide a more accurate portrayal of cumulative impact and risk. CalEnviroScreen can be a useful tool in highlighting cumulative impacts and how socioeconomic and environmental burdens can combine together to exacerbate harm inflicted on the community. The lowered overall scores in draft CES 5.0 do not accurately represent the burden populations face along census tracts on the San Francisco Bay shoreline.

Addressing the unique risk sea level rise and groundwater rise poses to shoreline communities facing cumulative burdens cannot wait until CalEnviroScreen 6.0. This data is critical. **It is counterproductive and misleading to significantly lower the Overall CalEnviroScreen percentile scores for several shoreline contaminated sites when including climate crisis impacts as a variable would likely increase most, if not all, of those census tract scores.** Contaminated shoreline communities are at immediate higher risk, right now, as sea and groundwater levels are already rising. Increased flooding from storm surges and atmospheric rivers are already presenting problems and interacting with contamination. The entire Bay shoreline is expected to be impacted by sea level rise and/or groundwater rise and OEHHA must act proactively and with urgency.

Local, regional, state and federal agencies in California have a long history of failing to protect our most vulnerable communities by not following through on their missions or commitments to these communities. The Draft CalEnviroScreen 5.0 Technical Report even stated that, “The incorporation of climate data into CES was a topic of interest during the public process of the CES 4.0 release. It has also been raised as a key priority during discussions with community-based organizations as part of the co-design effort on the continued development of the CES tool. There is general acknowledgement that communities are facing increasing risk from environmental hazards and vulnerability to pollution due to climate related events that already occur and are likely to worsen in the coming years.” (page 11). Why are Climate Change Indicators and Climate Impacts not included in this draft? There is public pressure and urgency to justify its inclusion immediately.

Communities living on or next to toxic waste sites for years to decades are particularly overdue for justice. ***How can OEHHA justify this pattern of lower scores along the Bay Area shoreline? What justifies an almost 50% decrease on Overall CalEnviroScreen scores for***

*several shoreline contaminated sites, many with pollution burden and socioeconomic indicators scoring at or above the 90th percentile?*

**Comment 2: Potential to Negatively Impact Funding Opportunities for Frontline Organizing on the San Francisco Bay Shoreline**

CalEnviroScreen is a designation tool for SB 535 where a community is identified as disadvantaged if the census tracts scores within the top 25 percent of overall scores in CalEnviroScreen. Census tracts that were not initially identified in the 2017 DAC designation as disadvantaged with scores *now* below the top 25 percent, will lose funding opportunities. Communities that qualify as disadvantaged through SB 535 in California are specifically targeted for investment of proceeds from the state's Cap-and-Trade Program, therefore lowering overall scores for census tracts can directly impact critical funding opportunities for frontline organizing and community advocacy. Local, state, and federal agencies also rely on frontline organizers to expand their reach to impacted communities. Misleading low CES 5.0 scores will threaten funding, thus weakening community protections and the agencies tasked with serving them.

**Closing Statement**

The San Francisco Bay Shoreline Contamination Cleanup Coalition (SFBSCCC) is predominantly made up of frontline community organizations, all concerned about the health and safety of our communities and surrounding environments. As a coalition, we are most concerned about our most disadvantaged communities which are disproportionately exposed to environmental contamination and toxic sites, due to discrimination such as redlining, environmental racism, and classism. We feel particularly strongly that exposure to toxic and radioactive waste, as well as the capping of contamination on the shoreline where residential housing is to be built, are dangerous, unjust and further threaten already disadvantaged communities. Shoreline communities need CalEnviroScreen 5.0 to be a powerful tool that represents the cumulative risk, including sea level rise and groundwater rise.