

Bayview Hunters Point/Southeast San Francisco AB 617 Community Steering Committee

April 1, 2026

CalEnviroScreen

Office of Environmental Health Hazard Assessment (OEHHA)
California Environmental Protection Agency
1001 I St., fl. 12
Sacramento, California 95814

Re: Public Comment on Draft CalEnviroScreen 5.0 — Methodological Concerns for Bayview Hunters Point / Southeast San Francisco

Dear OEHHA Staff:

The Bayview Hunters Point/Southeast San Francisco (BVHP/SESF) AB 617 Community Emissions Reduction Plan (CERP) Community Steering Committee (CSC) submits these comments on behalf of the residents of Bayview Hunters Point and Southeast San Francisco, a community that has endured more than a century of industrial disinvestment, toxic contamination, and environmental injustice. We appreciate OEHHA's continued work to update CalEnviroScreen (CES) as a cumulative impact tool. However, the draft CalEnviroScreen 5.0 results for our community contain significant methodological shortcomings that, taken together, produce scores that dramatically understate the pollution burden and health vulnerability our community faces. These errors are not minor rounding issues; they carry direct policy consequences for our eligibility for resources, regulatory protections, and enforcement priority under AB 617 and related statutes. We urge OEHHA to address each of the concerns detailed below before finalizing the tool.

1. The New Diesel Particulate Matter Model Severely Underestimates Actual Exposure in Our Community

The shift to a new DPM dispersion model has produced results that bear no resemblance to measured or lived reality in our neighborhoods. For the Hunters Point Census Tract 6075980600, the DPM percentile collapsed from 99.48 in CES 4.0 to just 11.36 in the draft CES 5.0, a drop of 88 percentile points. For Silver Terrace Census Tract 6075023003, DPM fell from 98.46 to 26.45. These tracts sit downwind of two of the Bay Area's highest-volume diesel freight corridors: the shipping lanes of San Francisco Bay, and the I-280 / US-101 interchange. San Francisco's prevailing westerly and northwesterly winds routinely carry diesel PM well beyond 1,000 feet and in some conditions, 4,000 to 5,000 feet or more. If the new model is truncating dispersion at a distance that does not reflect local meteorological conditions, it will systematically undercount DPM exposure for communities located downwind of shipping lane and highway sources, precisely the communities AB 617 was designed to protect.

2. Hazardous Waste Generator Scores Cannot Be Explained by a Mere Methodology Change

The Hazardous Waste Generators and Facilities indicator for the Hunters Point Census Tract 6075980600 dropped from a raw score of 2.07 to 0.455, and for Central Bayview Census Tract 6075061200 from 1.195 to 0.205. These steep declines, reductions of 78% and 83% respectively, are not mathematically consistent with the fact that the same decay model as version 4.0 was instrumentalized, as OEHHA's documentation suggests. A reweighting without changing underlying weights should preserve or modestly shift the aggregate score, not collapse it.

3. Small Air Toxic Sites Data Is Incomplete Due to Lax Enforcement, and the Default Score Assignment Requires Justification

Draft CES 5.0 assigns Hunters Point Census Tract 6075980600, a default Small Air Toxic Sites percentile of 8.48, despite no data being reported. We note that the absence of data in CEIDARS for this tract reflects a regulatory gap i.e., cottage industries and unpermitted facilities operating in Southeast San Francisco historically escaping routine Bay Area Air District (AD) inspection, not an absence of toxic emitters. Assigning a near-zero default score under these conditions effectively penalizes communities with weaker enforcement or reporting histories. Furthermore, most of the vacant land in the Hunters Point Tract is zoned to exclude new emissions-generating activity precisely because the area is already considered too toxic. The restriction for current-day industrial activities would then lower impacts from PM 2.5, Diesel Particulate Matter, Traffic Impacts, Hazardous Waste Generators and Facilities in addition to Small Air Toxic Sites. A methodology that treats missing or lack of current-day data as low burden, in a tract where toxic exposure drove zoning restrictions, is logically inverted. OEHHA should disclose what default percentile is assigned when no CEIDARS data is available, and should consider whether a precautionary assignment reflecting known enforcement gaps is more appropriate.

We are afraid that a low-burden score at Hunters Point, a tract with two EPA Superfund sites, undermines the efforts and public confidence in CalEnviroScreen. Effective data adjustments for such a tract restricted from current-day industrial uses can be some type of minimum pollution burden weight for the proportional acreage that's designated as a Superfund site.

4. Health Outcome Indicators Are Unreliable for Small, Rapidly Gentrifying Tracts

Hunters Point Census Tract 6075980600 has an estimated population of only 1,290. At this scale, health outcome estimates from PLACES data, themselves derived from multilevel Bayesian models with substantial shrinkage toward county-level means, carry enormous variance and are disproportionately influenced by San Francisco County as a reference population. San Francisco County as a whole has significantly different demographic and health profiles than the legacy African American and Pacific Islander residents of Hunters Point. For this tract, the draft CES 5.0 assigns Diabetes Prevalence a percentile of 13.51, based on a reported rate of 8.7%, a figure that does not reflect community members' lived experience and is almost certainly an artifact of shrinkage and a misaligned reference population.

This problem is compounded by gentrification-driven in-migration. New residents, often younger, healthier adults relocating from elsewhere to the tract's predominantly newly built housing, dilute health outcome measurements for the long-term residents who actually bear the burden of decades of toxic exposure. American Community Survey mobility data (including year

of residence and five-year data from 2014–2018) could be used to model health outcomes controlling for in-migration rates. At minimum, OEHHA should acknowledge the limitations of tract-level PLACES estimates for small, rapidly changing populations, and should not weight PLACES-derived indicators equally with more robust direct measurements in the composite score.

5. Unemployment Data Volatility Makes It an Unreliable Indicator in Southeast San Francisco

In Central Bayview Census Tract 6075061200, draft CES 5.0 reports an unemployment rate of 0, resulting in a percentile of 0, despite educational attainment sitting at the 73rd percentile of disadvantage and poverty at the 50th percentile. These indicators are not consistent with a true unemployment rate of zero; they reflect data volatility in a small ACS sample, not economic reality. This inconsistency does not inspire confidence in unemployment as an indicator for small urban tracts experiencing rapid demographic change. We ask OEHHA to review its data imputation strategy for tracts where unemployment estimates are statistically unreliable or suppressed, and to consider whether this indicator should carry reduced weight or be replaced with a more stable proxy in communities with high demographic flux.

Conclusion

Bayview Hunters Point has been fighting for environmental justice for decades. Our community successfully advocated for AB 617 protections, pushed for the Hunters Point Shipyard cleanup, and continues to bear health burdens that no community should be forced to accept. CalEnviroScreen is not merely an academic exercise, it determines who gets resources, who gets attention from regulators, and who gets protected. When the tool produces results that are plainly inconsistent with both the data record and the community's lived experience, those results must be corrected before they become the basis for policy decisions.

We respectfully request that OEHHA conduct a targeted review of the DPM model, hazardous waste methodology, default score assignments, statistical adjustments for Superfund sites' impacts that restrict current-day emissions, and health outcome indicator reliability for low-population and gentrifying tracts, with particular attention to the Bayview Hunters Point community. We further request that OEHHA engage directly with the BVHP/SESF AB 617 Community Steering Committee and Bay Area AD staff before the tool is finalized. We are available to meet at your earliest convenience.

Sincerely,

BVHP/SESF AB 617 CERP Community Steering Committee

Signed by the following:

Arieann Harrison, CSC Co-Lead, Founder & Executive Director of Marie Harrison Community Foundation

Nina Omomo, CSC Co-Chair

Chalam Tubati, CSC Co-Chair