



August 8, 2026

1000 Grandmothers for Future Generations
1438 Josephine Street
Berkeley, CA 94703

Submitted electronically by Roni Diamant-Wilson, Ph.D., on behalf of the 1000 Grandmothers for Future Generations, Bayview Hunters Point Working Group of the San Francisco Circle

Director Kristina Thayer, Ph.D.
Office of Environmental Health Hazard Assessment
P.O. Box 4010
Sacramento, CA 95812-4010

Re: 1000 Grandmothers for Future Generation Comments on CalEnviroScreen 5.0 Draft

Dear Director Thayer,

Thank you for the opportunity to provide public comment on CalEnviroScreen 5.0.

Bayview Hunters Point in San Francisco has long borne the heaviest burden of ecological hazards and climate change. One mission of 1000 Grandmothers for Future Generations is to address the systemic racism underlying environmental injustices. For the past two years, the SF Circle's BVHP Working Group has worked alongside multiple groups in Bayview Hunters Point to address the environmental concerns of this frontline community, including efforts to hold the federal government accountable for the cleanup of the Hunters Point Naval Shipyard. In reviewing the most recent version of California's Environmental Health Screening Tool (July 2026), we are greatly concerned that, because it uses a different methodology than earlier models, it does not accurately reflect the community's lived reality.

First, according to the CalEnviroScreen 5.0, the Diesel Particulate Matter (DPM) percentile for Hunters Point dropped from 99.48 in the previous version to 11.36, a decrease of 88 percentile points. The affected census tracts (specifically Census Tract 9806) are downwind of major diesel freight corridors, including the shipping lanes of San Francisco Bay and the I-280 and US 101 interchanges. Local wind patterns (westerly and northwesterly) routinely carry particulate matter well beyond 1000 feet, sometimes as far as 4,000 to 6,000 feet. The concern is that the new model may truncate dispersion at a distance that does not reflect meteorological realities, leading to systematic undercounting of DPM exposure for the Hunters Point community.

Additionally, the CES 5.0 does not capture radioactive environmental pollution that was present in versions 3.0, 4.0, and 5.0 of the Hunters Point Naval Shipyard. The Shipyard has been a designated Federal Superfund site since 1989. The San Francisco Civil Grand Jury report of 2022 also finds that the Shipyard needs investigation and mitigation. The classification downgrade from 83% (CES 4.0) to 43% does not account for the identified radioactive contamination. Plutonium-239 in soil is allowed at levels 421 times higher than EPA remediation goals; thorium-232 at 974 times; radium-226 at 900 times; strontium-90 at 783 times; cobalt-60 in buildings at 3,925 times; uranium-235 in removable dust at 4,148 times EPA standards. Designating the Hunters Point Shipyard as Green (40th percentile) rather than Red (90th percentile) is inaccurate, given the science and the lived reality of a community with high rates of asthma, cardiac disease, cancer, and shortened life expectancy.

The CES is a tool used to determine eligibility for resources (SB 535), regulatory protection (AB 617), and enforcement priorities. Underestimating DPM exposure and radioactive contaminants will result in Bayview Hunters Point being deprioritized for needed interventions and support, with severe consequences for environmental justice and public health. The 1000 Grandmothers for Future Generations supports revising the CES 5.0 to better reflect the community's environmental conditions.

Thank you.

Sincerely,

A handwritten signature in dark ink, reading "Roni Diamant-Wilson". The signature is fluid and cursive, with the last name "Wilson" ending in a long, sweeping flourish.

Roni Diamant-Wilson, Ph.D.

Submitted on behalf of the 1000 Grandmothers for Future Generations, San Francisco Circle's Bayview Hunters Point Working Group