



**West Oakland
Environmental
Indicators
Project**

woeip.org

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Yana Garcia
Secretary for Environmental Protection
California Environmental Protection Agency
1001 I Street
Sacramento, CA 95812

Dear Secretary Garcia:

On behalf of the West Oakland Environmental Indicators Project and the thousands of West Oakland residents we serve, I'd like to congratulate you on the release of CalEnviroScreen 5.0. California continues to benefit from your leadership and commitment to empowering Californians and reducing the pollution burden of the state's most vulnerable and marginalized communities and residents. It's in that spirit that we offer these comments on CalEnviroScreen with the sincere hope that you and your team continue to improve the tool.

As you know, the Bay Area is an extremely complex region. While we have many wealthy residents who are thriving, we concurrently have some of the most socioeconomically and environmentally challenged communities that are engaged in an ongoing battle to recover from the nation's legacy of structural and systematic racism. San Francisco and Oakland, in fact, alternate as California's cities with the most unhoused residents per capita. Not only do our unhoused neighbors often go uncounted or undercounted, often unable to obtain a job or access the social safety net without a physical address, they are also exposed to more pollution and heat exposure than housed residents. CalEnviroScreen likewise fails them. The extreme wealth gap in the Bay Area further complicates how census tracts show up in a statewide tool. Due to the high cost of living, it's not unusual for Bay Area residents to be living on the edge of financial despair despite having an income higher than in other parts of the state where the cost of living is lower.

West Oakland is one of the most rapidly gentrifying areas in the state. New development, admittedly, is not intrinsically bad. However, legacy residents are often displaced due to gentrification, and sometimes these new residents are healthier than the ones they are displacing. This can skew CalEnviroScreen results and put these newer, healthier residents at risk of becoming ill eventually, like the residents they've displaced. There are many data gaps like this and assumptions that only touch the surface of a community and lead to results that overlook the complexity of an urban environment.

We strongly encourage CalEPA to take a more intensive look at Bay Area communities in particular. We believe it takes more time and many visits to understand the 'how' and 'why' that drives environmental injustice. Once that happens, we believe CalEnviroScreen will become a more effective and powerful tool.



West Oakland Environmental Indicators Project wholeheartedly endorses the following recommendations of our colleague organization Brightline Defense in San Francisco:

Pathway	Reason
1. Expand score threshold to 35% in CES 5.0 (up from 25%)	Captures high need environmental justice communities that are excluded due to systemic biases against urban communities.
2. Establish a ½-mile buffer around DACs	Accurately reflects realistic pollution impacts and aligns with statutory precedent under AB 1550.
3. Include the top 25% population burdened tracts	Recognizes historic and continuing racial, economic, and health inequities in these communities.
4. Carry over legacy CES 3.0 qualifying DACs	Protects long-term investments in EJ communities and addresses risks of gentrification.

In closing, West Oakland Environmental Indicators Project calls on CalEPA to implement expansions of the DAC designation to more accurately capture the increased need and vulnerability in communities across California like West Oakland, which are confronting affordability and climate crises, paired with an unprecedented retraction of federal investments. Instead of embracing what seems like arbitrary cut-offs based on tools that systematically fail to reflect realities on the ground, CalEPA should prioritize expanding eligibility to protect access so communities of need aren't overlooked.

We are available to host tours or deeper discussions for CalEPA staff to help them better understand our community and the environmental, health, and economic challenges facing our residents.

Sincerely,

Veronica Eady
Executive Director
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