

August 14, 2026

California Environmental Protection Agency  
1001 I Street, Suite #1  
Sacramento, CA 95814

**Subject: San Mateo County Comments on the Preliminary Designation of Disadvantaged Communities**

To Whom It May Concern:

San Mateo County appreciates the opportunity to comment on the State's preliminary designation of disadvantaged communities (DACs). These designations influence which communities receive eligibility, priority, or preferred scoring for critical State investments. It is therefore essential that the designation methodology accurately identify communities experiencing persistent environmental, socioeconomic, and climate-related burdens and avoid excluding communities solely because of changes in datasets, indicator methodologies, or census boundaries. The County respectfully recommends revisions that would provide a more inclusive, consistent, and locally responsive approach to identifying disadvantaged communities.

The County respectfully recommends that the State revise the final designation to:

- Include census tracts with CalEnviroScreen 5.0 overall scores in the top 40 percent statewide, rather than limiting designation to the top 25 percent;
- Recognize disadvantaged or environmental justice communities identified in an SB 1000-compliant city or county General Plan Environmental Justice Element; and
- At minimum, retain communities designated in either of the two prior designation rounds so that methodology changes do not interrupt access to State funding opportunities that prioritize communities based on CalEPA's DAC designations.

## **Expand the CalEnviroScreen Threshold**

Limiting designation to the highest 25 percent of CalEnviroScreen scores does not adequately capture cumulative burden in San Mateo County and the wider Bay Area. CalEnviroScreen is an important statewide screening tool, but its statewide percentile framework and selected indicators can underrepresent need in high-cost regions. For example, its poverty measure does not fully reflect the financial hardship experienced by households in San Mateo County, where basic living and housing costs are substantially higher than in many other parts of the state. Additionally, lower-income populations may live within census tracts that also contain substantial numbers of higher-income households. Although these higher incomes do not directly change the percentage of residents meeting CalEnviroScreen's poverty threshold, analysis at the census-tract scale can mask concentrated economic hardship within particular neighborhoods or populations. A household may therefore experience severe economic vulnerability locally without ranking among the most burdened census tracts statewide under the CalEnviroScreen methodology.

Expanding the threshold to the highest 40 percent would better account for these regional differences and capture communities that face meaningful cumulative burdens but fall just outside the current cutoff. It would also reduce the extent to which small score changes caused by updated datasets, modeling assumptions, or percentile recalibration determine whether a community remains eligible for priority investment.

## **Recognize Communities Identified Through Local Environmental Justice Analysis**

The State should also recognize disadvantaged communities identified through a city or county General Plan Environmental Justice Element. SB 1000 requires cities and counties with disadvantaged communities in their planning areas to identify those communities in their general plans. Importantly, the statute defines disadvantaged communities to include not only areas designated by CalEPA, but also low-income areas disproportionately affected by environmental pollution and other hazards. Official guidance from the Governor’s Office of Land Use and Climate Innovation and the California Attorney General further directs local governments to use data analysis and community engagement to identify and describe these communities and their particular burdens.<sup>1,2</sup> These locally adopted analyses therefore represent a State-mandated complement to CalEnviroScreen because they can use finer geographic scales, locally appropriate income thresholds, additional hazard and vulnerability information, and community knowledge. Failing to give these locally identified communities meaningful recognition in State funding decisions creates a disconnect: local governments are required to identify and prioritize communities experiencing environmental injustice, yet those same communities may remain ineligible for State investments intended to address comparable burdens.

San Mateo County is completing an Environmental Justice Element and has documented its community-identification methodology in a technical appendix. The County’s analysis uses census block groups and California Department of Housing and Community Development low-income limits for San Mateo County. It also incorporates local knowledge of pollution and hazard conditions, including flooding and sea-level-rise exposure, to supplement CalEnviroScreen. The block-group scale is particularly important in San Mateo County, where sharp income and environmental disparities within a single census tract can be obscured when conditions are averaged across the larger geography.

Recognizing communities identified through Environmental Justice Elements would not replace CalEnviroScreen. It would create a complementary, transparent pathway grounded in State planning guidance and locally adopted evidence. This pathway would help address potential disconnects between CalEnviroScreen’s complex statistical methodology and on-the-ground conditions by incorporating local data and residents’ lived experiences that may not be fully reflected in statewide scores. This would allow the State to benefit from detailed local analysis while maintaining a consistent statewide baseline.

## **Retain Communities Designated in Prior Rounds**

At minimum, communities designated in either of the two prior rounds should remain eligible under the current designation. Loss of DAC status should reflect demonstrated, sustained improvement in environmental and socioeconomic conditions—not changes in census tract boundaries, indicator weighting, source datasets, or modeling methods. A continuity provision is especially important because State investments in disadvantaged communities often progress over multiple years, from planning and capacity building through project development and on-the-ground implementation. Maintaining a stable designation supports sustained investment long enough to produce measurable improvements and avoids disrupting projects or initiatives already underway solely because the designation methodology has changed.

The County’s March 2026 review of Draft CalEnviroScreen 5.0 illustrates why this safeguard is needed. Several San Mateo County communities lost or were at risk of losing DAC status even though persistent environmental justice conditions remained:

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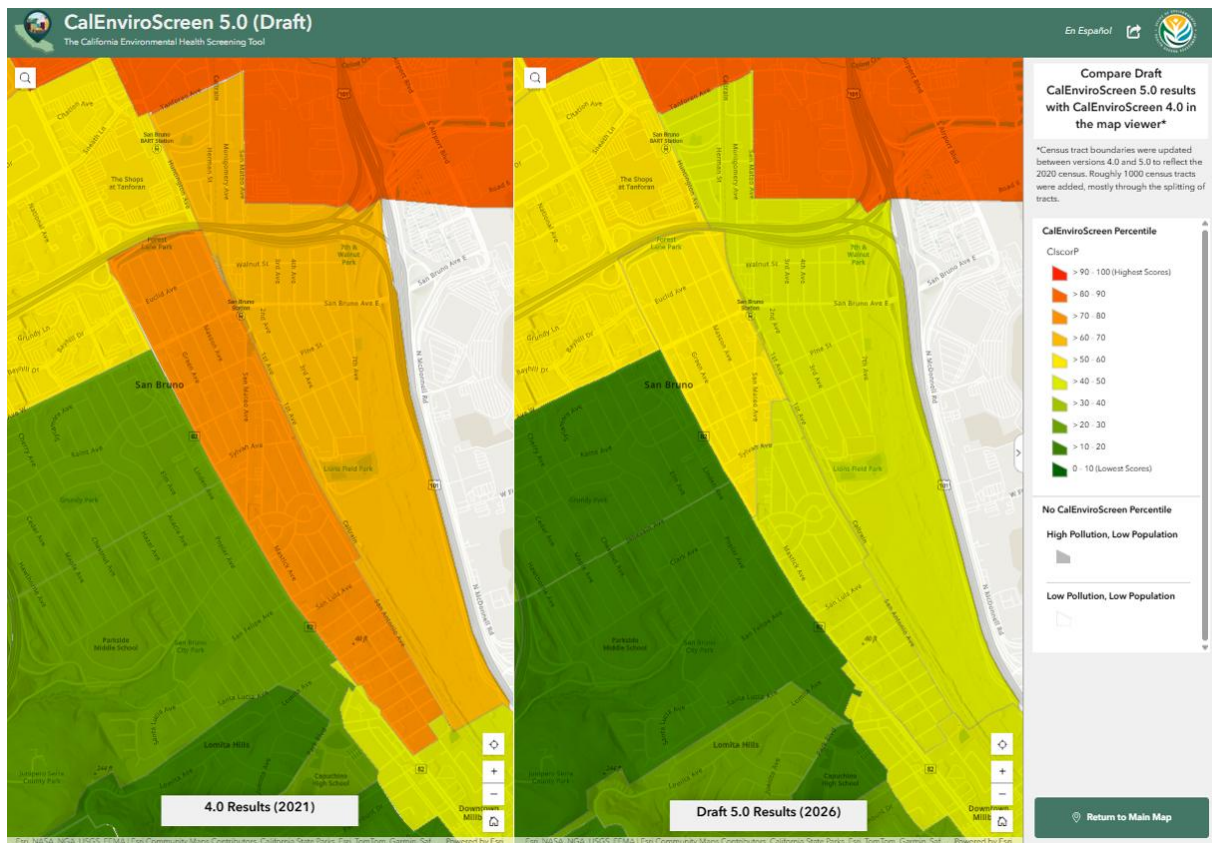
<sup>1</sup> California Department of Justice. 2023. Best Practices for Implementing SB 1000. <https://oag.ca.gov/system/files/media/sb-1000-best-practices-en.pdf> (accessed August 2026).

<sup>2</sup> Governor’s Office of Land Use and Climate Innovation. 2020. General Plan Guidelines, Chapter 4: Environmental Justice Element. [https://lci.ca.gov/wp-content/uploads/20200706-GPG\\_Chapter\\_4\\_EJ.pdf](https://lci.ca.gov/wp-content/uploads/20200706-GPG_Chapter_4_EJ.pdf) (accessed August 2026).

- In San Bruno, a previously designated tract was divided into two tracts (see Figure 1). The population remained nearly unchanged, but the redistribution of indicators across the new boundaries lowered both resulting composite scores even though residents continue to live near major transportation corridors and industrial uses.
- In the City of San Mateo, the division of a previously designated tract redistributed hazardous-waste and solid-waste indicators between the resulting tracts (see Figure 2). Residents remain near the same sources, but tract boundaries changed how those burdens were assigned.
- In East Palo Alto, the division of a tract separated burdens associated with Highway 101, the Ravenswood industrial area, and the low-lying bayfront (see Figure 3). Each resulting tract captured only part of the original cumulative burden, although the community continues to face traffic-related air pollution, industrial exposure, flooding, groundwater rise, and legacy contamination concerns.
- In North Fair Oaks, where the tract boundary did not change, updated datasets and indicator scores moved the tract below the DAC threshold despite ongoing burdens related to older housing, nearby industrial and auto-related uses, renter vulnerability, and socioeconomic conditions (see Figure 4).
- In Redwood City, large percentile changes in housing burden and unemployment appeared to reflect changes in data inputs and denominators more than corresponding improvements in housing affordability or lived conditions (see Figure 5).

Together, these examples show that designation status can change because of technical sensitivity rather than material improvement. Grandfathering previously designated communities would provide stability, protect ongoing planning and partnerships, and avoid penalizing residents for methodological changes beyond their control.

**Figure 1**      **CalEnviroScreen Indicator Comparison – City of San Bruno (Census Tracts 6081604101 to 6081604104 and 6081604103)**

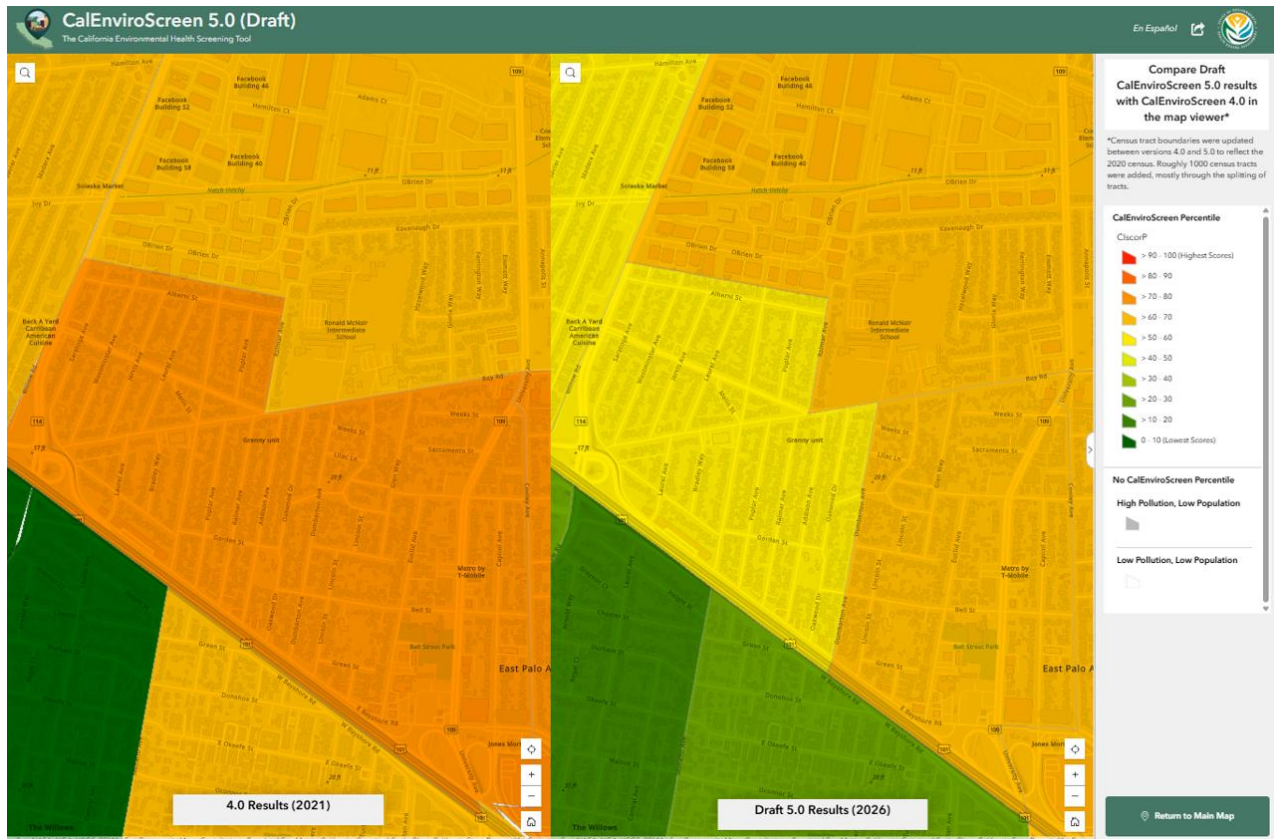


**Figure 2** CalEnviroScreen Indicator Comparison – City of San Mateo (Census Tracts 6081606200 to 6081606201 and 6081606202)

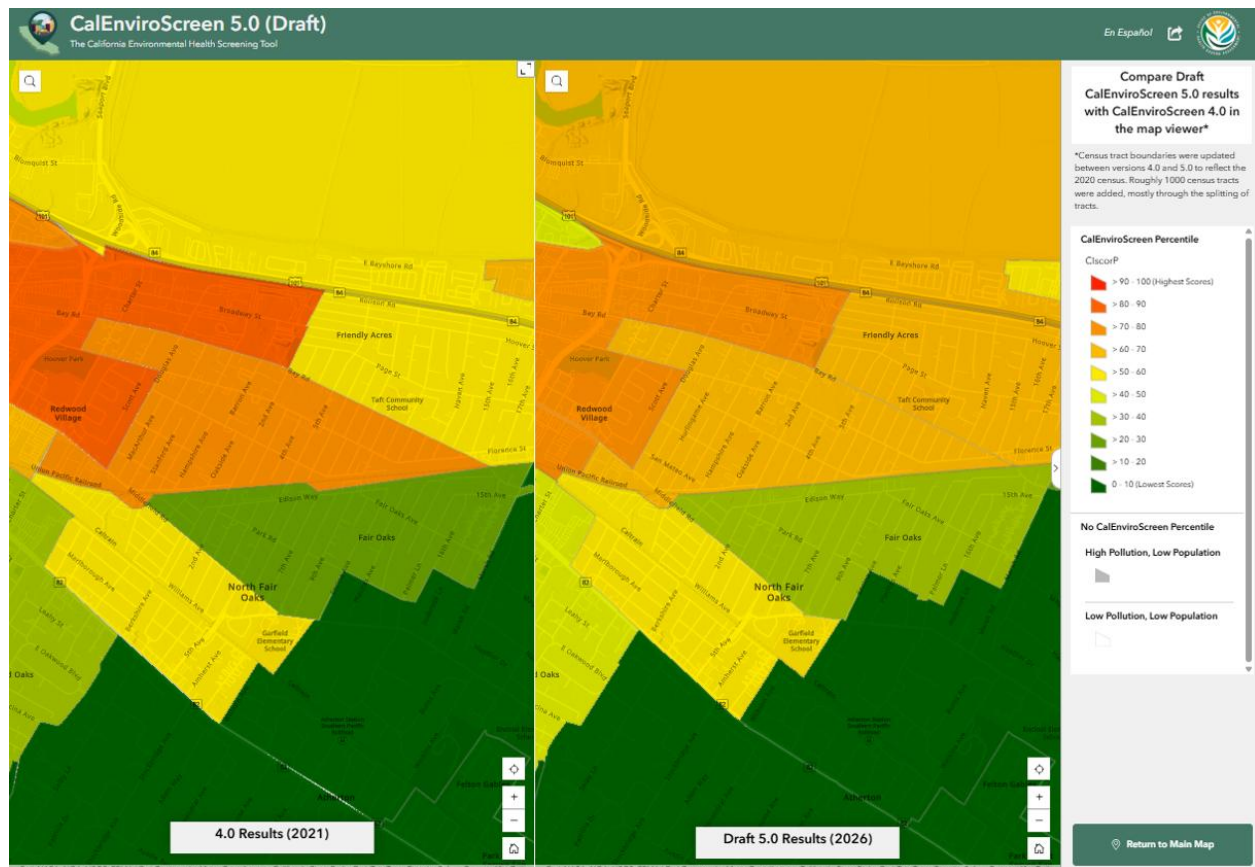




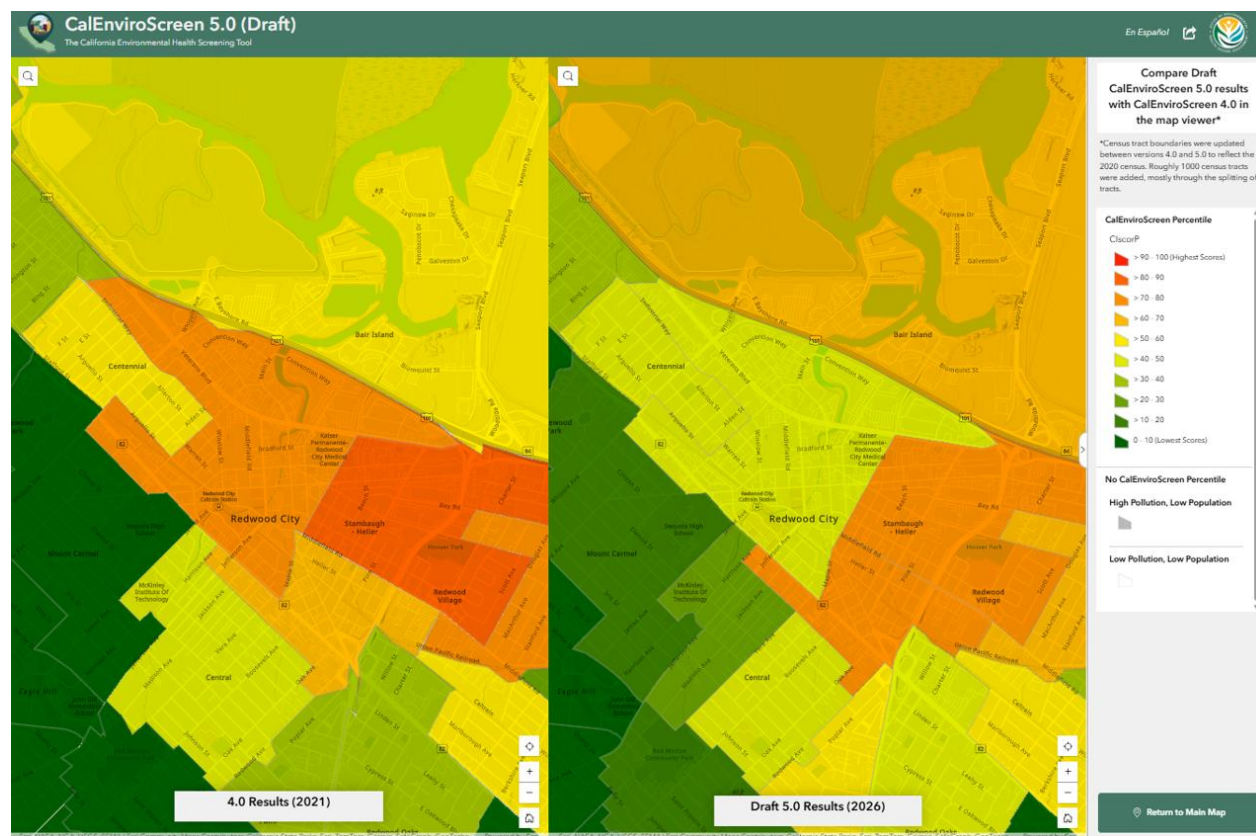
**Figure 3** CalEnviroScreen Indicator Comparison – City of East Palo Alto (Census Tracts 6081612000 to 6081612001 and 6081612002)



**Figure 4**      **CalEnviroScreen Indicator Comparison – North Fair Oaks (Census Tract 6081610500)**



**Figure 5** CalEnviroScreen Indicator Comparison – City of Redwood City (Census Tract 6081610202)



### Address Limitations Relevant to San Mateo County

The requested changes would also help address limitations in the range and geographic scale of conditions represented by CalEnviroScreen. The tool does not currently account for future sea-level rise, rising groundwater, wildfire smoke, or extreme heat. In San Mateo County's shoreline communities, sea-level rise and groundwater rise can worsen existing pollution burdens by mobilizing contaminants at legacy industrial or cleanup sites and creating new exposure pathways. The omission of current and projected climate hazards creates a fundamental disconnect when CalEnviroScreen designations are used to prioritize investments funded through the State's Cap-and-Invest Program: proceeds generated through efforts to reduce greenhouse gas emissions may not be directed to communities facing the greatest climate-related risks. This is a missed opportunity to align the State's climate investments with both existing pollution burdens and future climate vulnerability.

California has already demonstrated the value and feasibility of such an approach through the Governor's Office of Land Use and Climate Innovation's Vulnerable Communities Platform, which combines social vulnerability information with current and projected exposure to extreme heat, flooding, sea-level rise, drought, and wildfire.<sup>3</sup> The Strategic Growth Council is also using the platform to help evaluate whether

<sup>3</sup> Governor's Office of Land Use and Climate Innovation. Vulnerable Communities Platform. <https://vcp.lci.ca.gov/> (accessed August 2026).



Transformative Climate Communities investments benefit communities vulnerable to climate impacts. CalEPA should similarly incorporate climate vulnerability into its designation process, whether through additional indicators, a complementary screening pathway, or coordination with existing State tools, so that climate funding reaches communities confronting both cumulative pollution burdens and escalating climate threats.<sup>4</sup>

CalEnviroScreen's census-tract scale can also mask disparities within communities. This is especially consequential in San Mateo County, where lower-income neighborhoods and populations facing environmental burdens may be located directly adjacent to high-income areas within the same tract. The locally adopted identification process required under SB 1000 can reveal these differences by incorporating finer-scale data, local conditions, and community knowledge, providing a more accurate picture of who is affected.

## Conclusion

San Mateo County supports the State's goal of using a clear and consistent framework to direct investments to communities with the greatest needs. To make that framework more equitable and durable, the County respectfully requests that the final 2026 DAC designation include the highest 40 percent of CalEnviroScreen 5.0 overall scores, recognize communities identified through local Environmental Justice Elements, and retain communities designated in CalEnviroScreen 3.0 and 4.0.

These changes would address known limitations in statewide screening, incorporate credible local evidence, and prevent communities from losing access to critical Proposition 4 and other funding opportunities because of methodological or geographic changes that do not reflect improvements in lived conditions.

We appreciate the State's consideration of these comments. County staff would welcome the opportunity to meet with CalEPA staff to discuss these concerns and recommendations in greater depth. To arrange a meeting or discuss any questions, please contact Connie Juarez-Diroll, Chief Legislative Officer, at 650-599-1341 or [cjuarez-diroll@smcgov.org](mailto:cjuarez-diroll@smcgov.org).

Sincerely,



Noelia Corzo, President  
San Mateo County Board of Supervisors

CC: San Mateo County Board of Supervisors  
San Mateo County Executive

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<sup>4</sup> Office of Environmental Health Hazard Assessment. 2026. Mapping Local Knowledge and Experiences: Co-designing Proposed Updates to CalEnviroScreen with California Communities. <https://oehha.ca.gov/sites/default/files/media/2026-01/calenviroscreen50codesignreportd12226.pdf> (accessed August 2026).

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