

July 2026

Subject: Public Comments on Disadvantaged Communities Designation and CalEnviroScreen 5.0

To California Environmental Protection Agency,

The following comments on DAC definition and CalEnviroScreen 5.0 are submitted by the undersigned organizations: SPUR, Youth United for Community Action, Belle Haven Empowered, Climate Resilient Communities, Nuestra Casa and Belle Haven Community Development Fund. These organizations jointly form the Peninsula Accountability for Contamination Team (PACT), a coalition of community-based organizations and residents who advocate to advance contaminated site clean-up and infrastructure resilience, addressing the impacts of sea level and groundwater rise in low-lying areas of the Peninsula and beyond. Through this work, we aim to safeguard the health and well-being of our community for generations to come. Specifically, PACT focuses their work in well-known environmental justice communities on the Peninsula, including Redwood City, East Palo Alto, North Fair Oaks, North Central San Mateo, and Belle Haven (Menlo Park). We appreciate the opportunity to participate in the public comment process.

Core Concern: CES 5.0 Worsens Inequality and Access to Resources

Our core concern is that CalEnviroScreen 5.0 doesn't improve access to resources to address inequality and disproportionate exposure to climate risks in many disadvantaged Bay Area census tracts. On the peninsula, version 5.0 resulted in significant score drops for four census tracts that fell below the 75th percentile threshold despite continued and in some cases worsening pollution burdens. This is not an isolated case but a regional problem, as there are still serious methodological flaws that create gaps in the identification of disadvantaged communities in the Bay Area, including North Central San Mateo, Marin City, parts of East and West Oakland, the Canal District of San Rafael, the Tenderloin (SF), and Bayview-Hunters Point (SF). In urban regions, communities are more integrated, making it more challenging to identify a disadvantaged region when a community has extreme wealth inequality – a challenge further compounded by increasing gentrification across the Bay Area, which often displaces long-time residents. Historically, CES has never adequately represented Bay Area communities, and many communities have been repeatedly excluded from Disadvantaged Community (DAC) designation, including Belle Haven, a community within census tract 6081611700. CES 5.0 makes these shortcomings even more apparent, and it is critical that CalEPA carefully craft the DAC definition to address these flaws.

Request 1: Protect DAC Designation for Communities Identified in Earlier Versions

To protect communities at risk of being left behind, we call on CalEPA to combine versions 3.0, 4.0, and 5.0 under the DAC definition. DAC designation is critical: it has shaped philanthropy initiatives and more than \$12.8 billion in state funding. Need remains high in communities previously identified in earlier versions, and CalEPA must ensure these areas are not abandoned as the tool is updated. Funding from SB 535, Prop 4, and the private sector remains critical to these communities.

On the Peninsula, CalEnviroScreen 5.0 only identifies a single census tract in Redwood City as above the 75th percentile. We strongly support CalEPA's proposal to “carry over” designated DACs from CalEnviroScreen 4.0 - the 2022 designation - regardless of whether they fall in the top 25% of tracts under CalEnviroScreen 5.0. On the Peninsula, this extension would expand DAC designation in Redwood City to 2 census tracts (6081610202 and 6081610201), and from zero census tracts in East Palo Alto to 1 census tract (6081612000). This is a significant improvement that will allow Redwood City and East Palo Alto to access critical state funding for their communities.

However, combining versions 4.0 and 5.0 is not enough. To further protect communities at risk of being left behind, CalEPA must also include communities identified in version 3.0 in the DAC definition. Under CalEnviroScreen 3.0, there were key census tracts in Downtown Oakland, Richmond, San Pablo, Martinez, Pittsburg/Antioch, and San Jose that held DAC designation that are no longer recognized in this update. On the Peninsula, CES 3.0 would add one more census tract in East Palo Alto - 6081611900.

Request 2: Undertake a More Holistic Process to Accurately Capture Vulnerability

Beyond carrying forward earlier designations, CalEPA must focus on further strengthening CES's underlying methodology so that the tool better reflects lived experience, compounding pollution exposure, and communities facing extreme inequality. Specifically, we call on CalEPA to explore adding indicators, including ones for displacement and gentrification, climate change, and sea-level rise, to accurately account for historical and forward-looking risks that the current tool does not capture. As part of this tool improvement process, CalEPA and OEHHA must expand engagement with community organizations to better understand what communities CES is missing, especially in the Bay Area.

More broadly, we urge CalEPA to move away from a single composite score and toward a framework that integrates local data, refines indicators and their weighting, and broadens DAC designation to reflect the full range of environmental burdens communities face. While OEHHA and CalEPA work together to improve the tool, we would also like CalEPA to explore expanding DAC designation percentages. The current 75th percentile cutoff is an arbitrary line that leaves out communities with real and documented pollution burdens and environmental justice concerns simply because they fall just short of the threshold.

Request 3: Inclusion of the Belle Haven Neighborhood

Lastly, on the Peninsula, the Belle Haven neighborhood within Menlo Park - census tract 6081611700 - must be included under DAC designation. Belle Haven is one of the most diverse neighborhoods in San Mateo and, compared to Menlo Park, Belle Haven has higher rates of unemployment, lower rates of education, lower income levels, and higher rates of SNAP recipients, making Belle Haven residents vulnerable to displacement. Belle Haven also has a long history of redlining and other discriminatory housing practices, which have driven exclusion from government resources and disproportionate exposure to environmental pollution. Belle Haven is now facing gentrification and displacement pressures that are pulling down its Population Characteristics score on CES, even though its Pollution Burden score remains at the extreme high of the 88.22nd percentile. Belle Haven should be made eligible for state resources under DAC designation. Belle Haven could be a useful case study community for both CalEPA and OEHHA to examine as you update CES to include a larger number of disadvantaged and environmental justice communities; any proper account of environmental injustices would be able to include a community with a documented history of extreme segregation and massive pollution burden.

Sincerely,
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