



July 31, 2026

Email: DACinquiries@calepa.ca.gov

Re : DAC Status for the City of Soledad

Dear CalEPA Staff:

On behalf of the City of Soledad, we respectfully submit this comment regarding CalEPA's Preliminary 2026 Designation of Disadvantaged Communities. The City requests that CalEPA re-evaluate how the proposed census-tract methodology represents Central Coast rural communities like Soledad, which faces substantial and measurable socioeconomic challenges, however, the City's census tracts do not appear to qualify under the preliminary designation.

We are concerned that the methodology does not fully capture the conditions experienced by many Soledad residents and may unintentionally exclude communities with significant need from critical state investments. Portions of the City were historically designated as a Disadvantaged Community (DAC) but lost that designation under the current methodology, despite being immediately adjacent to a neighboring census tract that remains classified as a DAC. This outcome illustrates how small changes in census tract boundaries or scoring methodology can produce inconsistent results that do not accurately reflect community conditions.

Soledad is a compact city of approximately 4.46 square miles, which includes the Soledad Prison, wastewater facility, and Los Coches Adobe. However, our residential population is concentrated in 2.2 miles with a population density of approximately 7,835 people per square mile. Being so small geographically, poverty is not always concentrated within clearly defined neighborhoods or census tracts but interwoven throughout the community.

Current U.S. Census Bureau data demonstrate the disparity between Soledad and California as a whole:

- Soledad's per capita income is \$22,353, compared with \$49,513 statewide. Soledad's per capita income is therefore less than half the California level.
- Approximately 16.7 percent of Soledad residents live in poverty, compared with 11.8 percent statewide.
- Soledad averages 4.16 persons per household, reflecting the larger households and shared housing arrangements common in the community. The average household in California is 2.84.
- Approximately 69.2 percent of residents age five and older speak a language other than English at home.

- Only 57.9 percent of adults age 25 and older have completed high school, compared with substantially higher educational attainment statewide.
- Only 6.4 percent of Soledad adults hold a bachelor's degree or higher.
- Approximately 11.8 percent of residents under age 65 lack health insurance.

Median household income alone does not tell the full story. In a community with an average household size of 4.16 people, household income must support significantly more individuals than it does in a smaller household. Soledad's per capita income provides a clearer picture of the resources actually available to residents. High housing costs, large household sizes, poverty, limited educational attainment, language barriers, and restricted access to services combine to create disadvantages that may not be visible when households with different income levels are averaged together within a census tract.

Soledad also functions as an important service and activity center for residents of nearby rural South Monterey County communities. These surrounding communities face additional barriers related to transportation, geographic isolation, limited services, and access to affordable youth, recreation, health, and community programs. A designation system based on individual census tracts can separate communities that are economically and functionally connected.

The practical consequence extends beyond the designation itself. Disadvantaged-community status is frequently used to establish eligibility or award competitive priority under state grant programs. When Soledad's needs are not accurately reflected, the City may be unable to compete effectively for investments in parks, youth development, environmental improvements, public health, climate resilience, and other essential community infrastructure. This creates a cycle in which communities with limited local resources also face reduced access to the state funding intended to address those limitations.

CalEnviroScreen 5.0 places significant emphasis on air quality indicators, which can disadvantage coastal communities that benefit from naturally better air quality due to geographic conditions. As a result, communities like Soledad may receive lower overall scores despite facing substantial socioeconomic challenges, including limited access to safe and affordable housing, overcrowding, and persistent poverty. These conditions should receive greater consideration to more accurately reflect cumulative community disadvantages. The current methodology also results in a disproportionate concentration of Disadvantaged Community (DAC) designations in inland California, even as some of those areas have experienced significant economic growth and expanded housing opportunities, while many coastal agricultural communities continue to face severe affordability and infrastructure challenges.

The City respectfully requests that CalEPA:

1. Review the CalEnviroScreen 5.0 data and preliminary designation for all census tracts encompassing Soledad and confirm that the appropriate geographic boundaries, population data, and socioeconomic indicators have been applied.
2. Consider whether census tracts are sufficiently precise for small, dense communities where households experiencing poverty are geographically interwoven with households earning moderate or higher incomes.

3. Evaluate the use of smaller geographic units, such as census block groups, when tract-level averages may mask meaningful concentrations of hardship.
4. Incorporate supplemental indicators such as per capita income, household size, poverty, housing cost burden, overcrowding, educational attainment, linguistic isolation, youth poverty, and access to essential services.
5. Establish a transparent alternative-designation or exception process through which local governments can submit reliable evidence demonstrating that census-tract rankings do not accurately reflect local conditions.
6. Allow state funding programs to recognize documented low-income and vulnerable populations within communities that fall outside the highest 25 percent of statewide CalEnviroScreen scores.
7. Provide guidance explaining how communities such as Soledad can document and receive appropriate consideration for disadvantaged residents when applying for state grants that rely on DAC status.

We recognize the importance of a consistent statewide methodology and understand that CalEnviroScreen is intended to measure the combined effects of pollution burden and population vulnerability. However, consistency should not prevent the State from recognizing circumstances in which jurisdictional size and coastal location mask genuine and well-documented need.

We respectfully ask CalEPA to reconsider how small, coastal, dense communities are evaluated and to provide a meaningful pathway for Soledad to submit additional local evidence before the 2026 designations are finalized.

Thank you for considering the City of Soledad's comments and for your continued work to ensure that California's environmental and climate investments reach communities experiencing substantial need. If you have any questions, please reach out at (831) 529-6948 or mhunter@cityofsoledad.gov.

Sincerely,



City Manager, City of Soledad