



August 14th, 2026

Yana Garcia, Secretary for Environmental Protection
California Environmental Protection Agency
1001 I Street, P.O. Box 2815
Sacramento, CA 95812

Re: Comments to Improve CalEPA's Preliminary 2026 Disadvantaged Communities (DACs) Designation

Dear Secretary Garcia,

We appreciate the opportunity to submit comments on California Environmental Protection Agency's (CalEPA's) preliminary 2026 Disadvantaged Communities (DAC) designation. The Established in 2000, South of Market Community Action Network is a multi-issue and multi-strategy organization that nurtures the lives of youth, families, individuals and workers. We work on a wide range of issues—from tenant rights to community planning to Filipino language access to workers rights—and provide culturally competent direct services ranging from tenant counseling to family support to youth empowerment to employment. SOMCAN believes in uplifting the voices of immigrant, people-of-color, and low-income communities, so they will be heard in local policy-making decisions and so civic offices are accountable to their needs.

The residents SOMCAN serves face a compounding set of environmental health vulnerabilities. South of Market is surrounded by major pollution sources, highways, freight routes, and industrial uses that have been concentrated in this neighborhood as a result of decades of exclusionary land use decisions. Residents live in older housing with poor ventilation, many in SRO hotels or dense multifamily buildings with no mechanical filtration. When wildfire smoke events occur, as they have with increasing frequency across Northern California and the Bay Area, SOMA residents have few options to protect themselves. They cannot seal their buildings against smoke, cannot relocate during smoke events, and lack access to commercial air purifiers that cost far more than most of our community members can afford. Many of these residents live in census tracts that will be excluded from CalEnviroScreen (CES) 5.0's DAC designation.

We highly support CalEPA's inclusion of carryover tracts from CES 4.0; however, there must be additional efforts to accurately capture the increased need and vulnerability in communities across California, which are confronting affordability and climate crises, paired with an unprecedented retraction of federal investments. Instead of arbitrary cut-offs based on tools that systematically fail to reflect realities on the ground, CalEPA must prioritize expanding eligibility to protect access so communities of need aren't overlooked.

CalEnviroScreen has consistently failed to accurately capture environmental justice communities, particularly with the unique conditions in the Bay Area. Since CES 5.0 has been finalized without meaningful changes to improve representation in the Bay Area, we turn to CalEPA to swiftly make this designation work accurately for all Californians—including those in San Francisco and the Bay Area. We urge CalEPA to interrogate and adopt solutions to broaden the designation, for example increasing to top 35%, adding a ½ buffer around top tracts, including top 25% of population-burdened tracts, and/or carrying over 3.0 tracts.

Sincerely,

A handwritten signature in black ink that reads "Zachary Frial". The script is fluid and cursive, with the first letters of each word being capitalized and prominent.

Zachary Frial
Social Development and Policy Coordinator
South of Market Community Action Network (SOMCAN)