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Chinatown Media and Arts Collaborative—
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Chinatown YMCA
Chinese Culture Center of San Francisco
Chinese for Affirmative Action
Chinese Historical Society of America
Chinese Newcomers Service Center
Chinese Progressive Association
Coalition for Community Safety and Justice
Community Youth Center
Donaldina Cameron House
Filipino Community Center
Filipino-American Development Foundation
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Foundation for Filipina Women's Network
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Center
Japanese Community Youth Council
Japantown Task Force
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SF Community Health Center
SF Hep B Free
Southeast Asian Community Center
Southeast Asian Development Center
West Bay Pilipino Multi-Service, Inc.
Wu Yee Children's Services

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,

On behalf of the Asian Pacific Islander Council of San Francisco (API Council), a coalition of 56 Asian American, Native Hawaiian, Pacific Islander, and immigrant-serving community-based organizations across San Francisco, we appreciate the opportunity to submit comments on CalEPA's preliminary 2026 Disadvantaged Communities (DACs) designation. State leadership is needed to ensure the designation accurately reflects the unique socioeconomic and environmental burdens facing Asian and Pacific Islander (API) communities.

API communities make up nearly 40% of San Francisco's population. While prior versions of CalEnviroScreen (CES) improved data collection and identification of community vulnerabilities, the newly finalized CES 5.0 continues to overlook key frontline communities in the Bay Area. Most notably, zero tracts in San Francisco's Chinatown are proposed for DAC designation, putting the community at risk of losing access to critical state funding.

Chinatown is one of San Francisco's densest neighborhoods. Thousands of low-income families and seniors live in small Single Room Occupancy (SRO) units, often just 8x10 feet, that lack central air conditioning, adequate ventilation, or air filtration. Residents are exposed to vehicle exhaust and diesel pollution from nearby highway corridors, and during wildfire season, those living in poorly ventilated SROs have limited protection from unhealthy air and heat. The neighborhood also has limited access to green space, and many residents rely on public transit as their primary means of transportation.

We strongly support CalEPA's inclusion of carryover tracts from CES 4.0. However, additional action is needed to accurately capture communities facing increased vulnerability from the affordability and climate crises, now compounded by an unprecedented retraction of federal investments. CalEPA should not rely on arbitrary cutoffs from screening tools that fail to fully reflect conditions on the ground.

CalEnviroScreen has consistently failed to accurately capture many environmental justice communities, particularly given the unique conditions of the Bay Area. With CES 5.0 finalized without meaningful changes to improve Bay Area representation, we urge CalEPA to broaden the DAC designation and ensure San Francisco's Chinatown is included.

Options should include increasing the eligibility threshold to the top 35%, adding a half-mile buffer around top-ranked tracts, including the top 25% of population-burdened tracts, and/or carrying over qualifying CES 3.0 tracts.

These changes would help protect access to critical investments for communities that face significant environmental and socioeconomic burdens but are not adequately captured by CalEnviroScreen. We respectfully urge CalEPA to ensure the final 2026 DAC designation works for all Californians, including communities in San Francisco and throughout the Bay Area.

Sincerely,



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API Council
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