



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

14 August 2026

Dear Secretary Garcia,

Thank you for the opportunity to provide feedback on the 2026 Disadvantaged Communities (DAC) Designation.

Arriba South Coast works at the intersection of climate resilience, environmental justice, and economic equity, serving the rural, unincorporated communities of Pescadero, La Honda, Loma Mar, and San Gregorio in San Mateo County. We are extremely concerned that the CalEPA's policies, process, and methodology for determining Disadvantaged Community (DAC) status are inherently flawed and disregard the multiple, unprecedented crisis impacting under resourced and overburdened communities across California.

We support the recommendations of our peer community-based organizations to expand the DAC designation to accurately capture the real-world conditions facing California's most vulnerable populations today. These include the recommendations put forth by BrightLine Defense to increase the DAC threshold to the top 35%, add a half-mile buffer around designated tracts, and retain all communities with DAC status from CES 3.0 and 4.0.

**In addition, we urge CalEPA to establish a transparent alternate designation and appeals process that allows rural communities and smaller population centers within large census tracts to demonstrate disadvantage using credible supplemental data.**

We see a critical deficiency where both CES 5.0 and the Vulnerable Communities Map (used by the Governor's Office of Land Use and Climate Innovation) fail to accurately reflect conditions of more rural populations and smaller communities within large census tracts.

**Problem 1: Census-tract geography masks rural disparities.** Using census tracts as defining borders presents numerous disadvantages for rural communities, as the population density is lower and more likely not as uniform as urban areas. This masks disparities in socio-economic

status, household demographics, access to essential services, and exposure to other forms of vulnerabilities such as climate hazards and agricultural pollutants.

**For example:** Pescadero sits in a census tract of 180 square miles which is home to San Mateo County's largest population of very low income agricultural and ag-adjacent workers. Yet these families live literally within a stone's throw of the County's wealthiest citizens. The disparity within a single census tract masks the needs of the most vulnerable households and does not accurately represent the need for greater investments in resilient infrastructure and essential services to serve these populations.

**Problem 2: Underlying federal datasets undercount vulnerable populations.** We believe federal data sources are incomplete and misrepresentative of our community. This may be partially due to the pandemic-related conditions that depressed the response rate during the 2020 census, as well as the reformulation of certain questions within the census survey itself. We believe these longstanding undercounting challenges may become even more pronounced if immigrant, non-English-speaking, and other hard-to-count populations become less likely to participate in future federal data collection efforts.

**For example:** the CES 5.0 data for the Pescadero census tract indicates zero (0) households with linguistic isolation, and similarly low scores for poverty, unemployment, housing burden, diabetes, and cardiovascular health. These findings are not aligned with the actual constituencies served by core services agencies in this community, which indicate as many as 47% of households have limited English proficiency, and high levels of very-low income and low-income households. Using local data, the County of San Mateo has identified Pescadero as a High Priority Environmental Justice Community.

These classification errors have material consequences for funding eligibility and programmatic investments. When an imperfect geographic unit or incomplete dataset prevents a genuinely disadvantaged population from qualifying for DAC status, the methodological error becomes an equity issue in its own right: **the communities most difficult to measure can also become the communities most difficult to fund.**

#### **Recommendations for the 2026 DAC Designation:**

If the state continues to use tools such as CalEnviroScreen and the Vulnerable Communities Map to determine funding priorities, **there must be a clear and consistent pathway for smaller jurisdictions within a census tract to present supplemental data and correct the inaccurate representation of their communities.** A defined and equitable alternate designation pathway or appeals process would help rural communities and smaller neighborhoods support their requests for DAC designation and funding access.

While both OEHHHA and LCI claim that communities can provide supplemental data to support eligibility for various funding programs, there are no specific guidelines or frameworks that outline

data types, quantity, quality, or methodology that would be acceptable. Smaller communities and CBOs should not have to guess what evidence the state will accept.

An alternate designation pathway should include the following elements:

- published criteria for what supplemental data are acceptable;
- eligibility for communities or population centers smaller than a census tract;
- acceptance of credible local administrative/service-provider data;
- a defined application and review process with timelines;
- a mechanism for appeal or reconsideration; and
- technical assistance and funding so small rural communities are not disadvantaged by their limited data-collection capacity.

**In summary**, we respectfully urge CalEPA to ensure that the 2026 DAC designation does not exclude vulnerable communities simply because their circumstances are obscured by census-tract geography or inadequately represented in federal datasets. In addition to considering the recommendations outlined above to expand and preserve DAC designations, we ask CalEPA to establish a clear alternate designation and appeals process for communities whose local conditions are not accurately reflected in CalEnviroScreen.

That process should include published standards for acceptable supplemental data, recognition of credible local and community-based data sources, and sufficient technical assistance and funding to ensure that small and rural communities can participate equitably.

A tool intended to direct resources toward California's most disadvantaged communities must be capable of recognizing disadvantage where it actually exists. Communities should not lose access to critical investments simply because their vulnerabilities disappear within the boundaries of a large census tract or because the populations most in need are also the populations least visible in federal datasets. We urge CalEPA to use the 2026 designation process to address these gaps and create a more accurate, transparent, and equitable pathway to DAC designation.

Thank you again for the opportunity to provide feedback into this process.

Sincerely,



Irma Rodriguez Mitton  
Executive Director  
Arriba South Coast