

**From:** Michelle Tran <michelle.tran@chinatownccdc.org>  
**Sent:** Friday, August 14, 2026 12:51 PM  
**To:** Inquiries, DAC  
**Subject:** DAC Comments From CCDC

**EXTERNAL:**

Dear Secretary Garcia,

We appreciate the opportunity to submit comments on California Environmental Protection Agency's (CalEPA's) preliminary 2026 Disadvantaged Communities (DAC) designation. Chinatown Community Development Center (CCDC) is a place-based community development organization, with 38 properties in San Francisco neighborhoods, providing affordable housing to over 5,000 San Franciscans - low-income families, adults, and seniors. We also provide housing to transitional aged youth and the formerly homeless.

We call upon the California Environmental Protection Agency to expand the Disadvantaged Communities designation to accurately reflect the unique vulnerabilities in our neighborhoods and, in particular, ensure that tracts in San Francisco's Chinatown are included.

Chinatown has one of the densest housing setups in the city. Thousands of low-income families and seniors live in small Single Room Occupancy (SRO) units—often just 8x10 feet—that lack central air conditioning, proper ventilation, or air filtration. Many communities in Chinatown are also surrounded by highway corridors, and breathe in high levels of vehicle exhaust and diesel. During the wildfire season, residents in poorly ventilated SRO buildings lack proper cooling and ventilation. In addition, access to green space is limited and residents heavily rely on public transit as the primary means of transportation. San Francisco's Chinatown is exactly the type of community that should be prioritized for increased environmental justice and equity investments; however, there are zero census tracts recognized in the current proposed DAC designation.

CCDC supports CalEPA's inclusion of carryover tracts from CalEnviroScreen (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, like Chinatown, 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.

To ensure the goals and potential of the California Climate Investments are realized, we call on CalEPA to expand the designation so communities like Chinatown have access to key investments.

Sincerely,

Michelle Tran on behalf of Chinatown Community Development Center

Best,

**Michelle Tran** (*she/her*) | **Sustainability Manager**

**Sustainability**

**Chinatown Community Development Center**

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