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August 14, 2026

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Secretary Yana Garcia
California Environmental Protection Agency
1001 I Street,
Sacramento, CA 95814

Re: Data Limitations in Draft CalEnviroScreen V5 Map Fail to Accurately Reflect Community Needs & Environmental Risks

Dear Secretary Garcia:

On behalf of the Marin County Board of Supervisors, I am writing to provide comment on the preliminary designation of disadvantaged communities (DAC) for 2026 based on CalEnviroScreen Version 5.0 released by the Office of Environmental Health Hazards Assessment (OEHHA). We are concerned that limitations in the data utilized to inform designations of DAC fail to recognize negative environmental health impacts of communities in Marin County that meet statutory criteria established in Senate Bill 535.

Despite data demonstrating significant needs, many communities that appear to meet statutory criteria outlined in SB 535 are being excluded from designation as a DAC and the critical resources such a designation unlocks. For example, demographic data collected and reported by OEHHA for preliminary DAC designations indicates that the Canal neighborhood of San Rafael reflects the socioeconomic conditions outlined in SB 535, specifically those that are “areas with concentrations of people that are of low income...high rent burden, or low levels of educational attainment.” Based on the data reported by OEHHA, the Canal neighborhood includes census tracts that are among those with the least educational attainment and greatest rates of linguistic isolation statewide while also experiencing high rates of poverty and housing cost burdens.

San Rafael Canal neighborhood census tracts & demographic data

Census Tract	Poverty Percentile	Educational Attainment Percentile	Linguistic Isolation Percentile	Housing Burden Percentile
6041112202	94.1	89.2	89.9	65.0
6041112203	93.6	99.8	99.9	68.6
6041112204	89.2	99.8	98.8	92.5

Source: Office of Environmental Health Hazards Assessment, Preliminary 2026 Disadvantaged Communities

The Canal neighborhood has been designated as disadvantaged by the Department of Water Resource and meets federal poverty thresholds for affordable housing investments, qualifying as low-income communities under the definitions established. Despite this and the above referenced data, the preliminary DAC designations

released by OEHHA fail to reflect these realities and the needs of the Canal neighborhood and others like it.

Additionally, there are major environmental health hazards that are currently not accounted for in the data utilized by OEHHA in creating CES composite scores. Specifically, the Canal neighborhood abuts a waterway that is subject to annual flooding that is worsening due to sea level rise and land subsidence. Regional sea level rise projections indicate that the Canal neighborhood is among the most vulnerable areas in Marin County, with portions of the community experiencing regular tidal flooding during king tides and storm events, which are expected to increase in frequency and severity in the coming decades. These recurring flood events threaten not only homes and businesses but also critical infrastructure, roads, and evacuation routes, compounding the community's existing socioeconomic vulnerabilities and creating serious public health and safety risks.

Given the increasing rate of sea level rise and number of communities across California facing growing annual risks from flooding, the lack of data on flood risks is a structural deficiency of the CalEnviroScreen methodology upon which DAC designations are made. The inability to account for these current harms to communities like the Canal neighborhood means that thousands of Californians are effectively invisible in critical state-level decisions about resource allocation that could help build the infrastructure needed now to mitigate future risks.

To account for this deficiency, we request OEHHA to incorporate data on flood risks into how environmental indicators are constructed for CalEnviroScreen. We recognize that doing so is beyond the scope of the preliminary designations for DAC but believe this is a critical measure to ensure that CalEnviroScreen 6.0 adequately accounts for increasing climate risks across California moving forward. In the meanwhile, we request that OEHHA provide an alternative means for consideration of conditions like those in the Canal neighborhood in San Rafael for designation as a DAC, such as considering designations made by other state climate agencies, like the Department of Water Resources, while existing risk metrics are not available.

We appreciate the opportunity to comment and look forward to continued partnership with your agencies as the County continues to strengthen its communities and mitigate environmental risks.

Sincerely,



Eric Lucan, President
Marin County Board of Supervisors

CC: Marin County Board of Supervisors