



**SAN FRANCISCO
ENVIRONMENT
DEPARTMENT**

**San Francisco
Planning**



**San Francisco
Water Power Sewer**
Services of the San Francisco Public Utilities Commission



**San Francisco
Department of Public Health**

Daniel Lurie
Mayor

August 14, 2026

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

Via email: DACinquiries@calepa.ca.gov

Re: Proposed Amendments to CalEPA's 2026 Disadvantaged Communities Designation

Dear Secretary Garcia,

On behalf of the San Francisco Environment Department, San Francisco Planning Department, San Francisco Public Utilities Commission, and the San Francisco Department of Public Health, we are writing to express our concerns regarding CalEPA's proposed disadvantaged communities (DAC) designations. We appreciate the work of the California Environmental Protection Agency (CalEPA) and Office of Environmental Health Hazard (OEHHA) to identify communities burdened by pollution and social inequities. This important work directs critical State resources to communities with the greatest need and vulnerabilities. We have significant concerns, however, that CalEPA's proposed disadvantaged communities (DAC) designations could exclude San Francisco and California communities experiencing significant cumulative environmental and social burdens.

Limitations in CalEnviroScreen 5.0 (CES 5.0) create an incomplete representation of California's environmental justice communities. CES 5.0 does not account for localized air quality data, climate change impacts, people experiencing homelessness, and disadvantages communities experiencing rapid population growth. These limitations exclude thousands of San Franciscans – and even more Californians – from accessing scarce equity and environmental justice resources. Of San Francisco's Environmental Justice Communities, only four out of thirteen are considered DACs.

The City has repeatedly raised these concerns at the public workshops and directly with OEHHA staff but has been told that the underlying methodology may not be revised until CES 6.0. Staff met with OEHHA staff to share San Francisco's feedback in June and July 2026. Staff also shared feedback on the draft DAC designations in CalEPA's two public workshops in July 2026.

Because these limitations may remain in the final 2026 DAC designation, CalEPA should adopt an interim approach that avoids excluding overburdened communities, while preserving priority to California's communities with the highest needs. We respectfully recommend either of the following amendments:

Option 1: Expand the DAC designation to include census tracts located within a half-mile radius of census tracts in the highest scoring 25 percent of CES 5.0. This geographic approach recognizes that neighborhood boundaries rarely align with census tract boundaries and that pollution impacts extend across adjacent tracts. CARB has used this buffer approach for funding allocations.

Option 2: Expand the DAC designation by increasing the eligibility threshold from the highest-scoring 25 percent to 35 percent of census tracts in CES 5.0. This broader threshold would capture additional communities that are currently excluded because of the known limitations in the CES 5.0.



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Furthermore, we have two technical adjustments for consideration. First, we recommend referring to all designated disadvantaged communities as CES 5.0 DACs, including communities designated under CES 4.0. Referring to these communities as "CES 4.0 Carry-Over DAC" suggests that their designation is temporary or may be removed in a future update. Second, we recommend rounding CalEnviroScreen scores to the nearest whole number when determining DAC eligibility so that minor decimal differences do not exclude census tracts that are effectively at the threshold. Census tract 6075061101, in San Francisco's Chinatown, for example, is an Environmental Justice community that has a score of 74.52.

We strongly urge CalEPA to adopt one of the more inclusive DAC designation options outlined in this letter and to commit to addressing the methodological issues in CES 6.0. An interim adjustment would better reflect cumulative environmental impacts and reduce the risk that communities are excluded because of limitations in the tool rather than an absence of need. The DAC designation is central to ensure equitable access to critical State resources and adopting these improvements will fulfill that commitment.

Thank you for your time and consideration.

Tyrone Jue, Director
San Francisco Environment Department

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